

Condensed Transcript

UNITED STATES DISTRICT COURT OF OHIO  
NORTHERN DISTRICT  
WESTERN DIVISION

ROBIE GASTON, )  
Plaintiff, )  
vs. ) Case No.  
FINANCE SYSTEM OF TOLEDO, ) 3:18-CV-02642-JJH  
INC., ) Judge Helmick  
Defendant. )  
- - -

TELEPHONE DEPOSITION OF NANCY QUIROGA

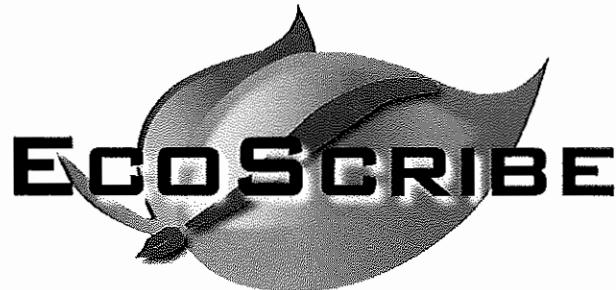
DATE: October 22, 2019 at 11:08 a.m.  
PLACE: Collins Reporting Service, Inc.  
615 Adams Street  
Toledo, Ohio  
REPORTER: Casey G. Schreiner, RMR-RDR  
Notary Public  
- - -

Job No. 31004

EcoScribe Solutions

[www.EcoScribeSolutions.com](http://www.EcoScribeSolutions.com)

888.651.0505





ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 2.5

Page 2			Page 3			
1 APPEARANCES:				I N D E X		
2 On behalf of the Plaintiff:				EXAMINATION		
3 ATLAS CONSUMER LAW:				Page	Line	
4 Nathan Volheim (via telephone)				3 NANCY QUIROGA		
5 2500 South Highland Avenue				Examination By Mr. Volheim .....	5 5	
6 Suite 200						
7 Lombard, Illinois 60148						
8 (630) 575-8181						
9 On behalf of the Defendant:				EXHIBITS		
10 LAW OFFICES OF JAMES S. NOWAK:				5 Exhibit A Description	Page Line	
11 James S. Nowak				Exhibit A Amended Notice of Deposition ...	12 10	
12 4808 North Summit Street				6 Exhibit B Answer to Complaint with .....	13 21	
13 Toledo, Ohio 43611						
14 (419) 726-2605				7 Exhibit C Def. FST First Set of Responses	72 18	
15 On behalf of the Defendant:				8 Exhibit D Def. First Set of Combined		
16 LAW OFFICE OF BOYD W. GENTRY:				Discovery Requests		
17 Boyd W. Gentry (via telephone)				9 Exhibit E Def. FST Produced Account Notes	24 11	
18 4031 Colonel Glenn Highway				for Clnt. Epmo Toledo Hospital		
19 Beavercreek, Ohio 45431				ER Physician		
20 (937) 839-2881				10 Exhibit F Def. FST Produced Account	.... 47 7	
21 ALSO PRESENT:				Notes		
22 Amy Pfeiffer				for Clnt Allstar Disposal and		
23				Recycling		
24				12 Exhibit G Def. FST Produced Account Notes	62 2	
				for Toledo Clinic, Inc.,		
				Reference No. 28093807001		
				13 Exhibit H Def. FST Produced Account Notes	53 4	
				for Toledo Clinic, Inc.,		
				Reference No. 27962730001		
				14 Exhibit I Def. FST Produced Account Notes	65 13	
				for Toledo Clinic, Inc.,		
				Reference No. 20000967861601954		
				15 Exhibit J Def. FST Produced Account Notes	36 18	
				for Various Accounts		
				16 Exhibit L Letter from Finance System of ..	18 10	
				Toledo, Inc		
				(Depositions Exhibits D, E, and K, were		
				pre-marked but not used.)		
				OBJECTIONS		
				21 By	Page Line	
				Mr Gentry .....	26 12	
				22 Mr Gentry .....	38 13	
				23 Mr Gentry .....	41 18	
				24 Mr Gentry .....	42 14	
				Mr Gentry .....	50 8	
				Mr Gentry .....	50 15	
				Mr Gentry .....	51 12	
1 Mr Gentry .....	51	23	Page 5			
2 Mr Gentry .....	52	20	1	NANCY QUIROGA,		
3 Mr Gentry .....	58	12	2	a Witness herein, called by the Plaintiff as if upon		
4 Mr Gentry .....	59	16	3	Examination, was by me first duly sworn, as		
5				4	hereinafter certified, deposed and said as follows:	
6				5	EXAMINATION	
7				6	BY MR. VOLHEIM:	
8				7	Q. Good morning. Can you state your full	
9				8	name for the record, please.	
10				9	A. Nancy Quiroga.	
11				10	Q. And for our court reporter's benefit, can	
12				11	you please spell your last name?	
13				12	A. Q-u-i-r-o-g-a.	
14				13	Q. Good morning, Ms. Quiroga.	
15				14	A. Good morning.	
16				15	Q. I apologize right off the bat if I, at	
17				16	any point today, mispronounce your name. My name is	
18				17	Nate Volheim. I am representative and counsel for the	
19				18	plaintiff in this matter.	
20				19	This is the matter of my client Robie	
21				20	Gaston vs. Finance System of Toledo. It was filed in	
22				21	the Northern District of Ohio under Case No. 18,	
23				22	civil, 02652.	
24				23	Ms. Quiroga, have you ever given	
				24	deposition testimony before?	

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 6..9

<p>1       A. No.</p> <p>2       Q. Okay. Whether you've done it a whole 3 bunch or this is your first time, there is a couple of 4 kind of helpful ground rules I want to go over.</p> <p>5       As you can tell, I'm appearing from my 6 office -- or you can't tell where I'm appearing, but 7 I'm in my office in Lombard, Illinois. There's no one 8 else with me. One of your counsel is over the phone, 9 as well, and then you also have counsel there present 10 with you.</p> <p>11       Other than counsel that is present in the 12 room with you and our court reporter, can you please 13 state who else is in the room with you?</p> <p>14       A. Amy Pfeiffer.</p> <p>15       Q. Okay. Other than Ms. Pfeiffer and our 16 court reporter, yourself and counsel, is there anyone 17 else in the room with you right now?</p> <p>18       A. No.</p> <p>19       Q. Okay. So, obviously, because we have 20 people appearing telephonically, that makes it a 21 little bit more difficult. I assume that you can hear 22 me very clearly right now?</p> <p>23       A. Yes.</p> <p>24       Q. Great. If, for whatever reason, you</p>	<p>Page 6</p> <p>1 cannot hear me, please just let me know, and I'll make 2 sure to repeat my question; however, if I ask a 3 question and you give an answer, I'm going to presume 4 that you understand the question.</p> <p>5       Is that fair?</p> <p>6       A. Yes.</p> <p>7       Q. Okay. You're doing an amazing job so 8 far, but it's important to make sure to keep all of 9 your answers verbal.</p> <p>10       Again, because I'm not in the room, and 11 because the proceedings are being transcribed, head 12 nods and body movement, that's not going to be picked 13 up, so it's very important to make sure that you keep 14 your answers verbal; is that understood?</p> <p>15       A. Yes.</p> <p>16       Q. Okay. Great. And if I have to remind 17 you, again, I'm not doing it to be offensive. I'll 18 just let you know that I need a different answer, but 19 it's in no way to be disrespectful.</p> <p>20       A couple other things. I do not 21 anticipate this deposition lasting more than two hours 22 today; however, if, at any point during this 23 deposition, you or anyone in the room needs to take a 24 break, that's fine. You're entitled to as many breaks</p>
<p>1 as you would like.</p> <p>2       The only thing that I ask is that if we 3 are in the middle of a question, we need to go ahead 4 and finish answering my question before we take a 5 break; is that agreed?</p> <p>6       A. Yes.</p> <p>7       Q. Great. Periodically throughout this 8 deposition, your counsel is likely to make objections, 9 either because they don't like the question I asked or 10 I did not ask it in the right way, which is entirely 11 likely.</p> <p>12       Unless your counsel instructs you not to 13 answer, once your counsel makes the objection, you can 14 go ahead and answer the question; is that understood?</p> <p>15       A. Yes.</p> <p>16       Q. Great.</p> <p>17       MR. GENTRY: Nancy, this is 18 Boyd. I will direct you as much as I can 19 remember to either go ahead and answer or 20 to not answer so that you're not left 21 wondering.</p> <p>22 BY MR. VOLHEIM:</p> <p>23       Q. Okay. Again, I don't say this to be 24 offensive in any way, but you understand that you are</p>	<p>Page 8</p> <p>1 under oath here this morning?</p> <p>2       A. Yes.</p> <p>3       Q. And that your answers are subject to the 4 penalty of perjury?</p> <p>5       A. Yes.</p> <p>6       Q. And then last question, you are not under 7 the influence of any substances, either legal or 8 illegal, that would impair your testimony to -- your 9 testimony here today; is that correct?</p> <p>10       A. Correct.</p> <p>11       Q. So you've stated your name. Can you 12 please state your current occupation?</p> <p>13       A. I'm the client services manager at 14 Finance System of Toledo.</p> <p>15       Q. Okay. Great. And how long have you 16 served in that role?</p> <p>17       A. It's coming up on 20 years.</p> <p>18       Q. Congratulations.</p> <p>19       A. Thank you.</p> <p>20       Q. Have you held any other roles with 21 Finance System of Toledo other than your current role?</p> <p>22       A. Yes.</p> <p>23       Q. What -- immediately preceding your 24 current role, what other role did you hold at</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 10..13

<p>1 Finance System of Toledo?</p> <p>2 A. The collections manager.</p> <p>3 Q. And how long did you serve in that role?</p> <p>4 A. Maybe two years.</p> <p>5 Q. Prior to that role, have you held any</p> <p>6 other roles with Finance System of Toledo?</p> <p>7 A. No.</p> <p>8 Q. Okay. So is it fair to say that you've</p> <p>9 been with Finance System of Toledo for about 22 years?</p> <p>10 A. No. Combined 20 years. I'm sorry.</p> <p>11 Q. Thank you for clarifying. Have those 20,</p> <p>12 approximately 20 years been consecutive?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. You haven't held any other jobs or</p> <p>15 any other occupations during that time?</p> <p>16 A. No.</p> <p>17 Q. Just as a general overview, can you tell</p> <p>18 me what kind of duties are involved in your current</p> <p>19 role?</p> <p>20 A. I'm the liaison between the client,</p> <p>21 staff, and the attorneys' offices, and the hospital,</p> <p>22 staff, administrative offices.</p> <p>23 Q. Okay. And from your answer, are all of</p> <p>24 Finance System of Toledo's clients medical providers,</p>	<p>Page 10</p> <p>1 or does it have other clients as well?</p> <p>2 A. Other clients.</p> <p>3 Q. Okay. And you handle other clients as a</p> <p>4 liaison, as well, not just medical clients?</p> <p>5 A. Correct.</p> <p>6 Q. Just a few more background questions.</p> <p>7 What is the highest level of education that you have</p> <p>8 achieved?</p> <p>9 A. Some college.</p> <p>10 Q. Okay. Did you get any sort of degree in</p> <p>11 college?</p> <p>12 A. No.</p> <p>13 Q. Do you have your high school diploma?</p> <p>14 A. Yes.</p> <p>15 Q. And I just want to make sure. You are</p> <p>16 not a licensed attorney; is that correct?</p> <p>17 A. That is correct.</p> <p>18 Q. Good for you. We have too many of those.</p> <p>19 Okay. Just generally, I'm not asking for</p> <p>20 your legal opinion in any way, what is your</p> <p>21 understanding of why you are here today?</p> <p>22 A. Based on the lawsuit that Mr. Gaston</p> <p>23 filed.</p> <p>24 Q. Okay. Our court reporter should have</p>
<p>1 some exhibits for you. I don't necessarily think</p> <p>2 we'll be using all the exhibits, so don't be afraid by</p> <p>3 the pile if you can see it.</p> <p>4 I'm going to ask our court reporter to</p> <p>5 hand you what has been pre-marked as Exhibit A, as in</p> <p>6 "apple." And if you can, take a look at that</p> <p>7 document, look through it, let me know after you've</p> <p>8 had a chance to review it.</p> <p>9 A. Okay.</p> <p>10 (Deposition Exhibit A was</p> <p>11 presented to the witness.)</p> <p>12 MR. VOLHEIM: Great. For the</p> <p>13 record, Exhibit A has been pre-labeled</p> <p>14 Amended Notice of Deposition.</p> <p>15 BY MR. VOLHEIM:</p> <p>16 Q. Have you seen this document before today?</p> <p>17 A. Yes.</p> <p>18 Q. Approximately when was the first time</p> <p>19 that you saw this document?</p> <p>20 A. Honestly, I can't be certain.</p> <p>21 Q. If you flip to page 2 of this document --</p> <p>22 actually, it would be page 3 for you with the cover</p> <p>23 sheet, there is a list of topics, 1 through 23.</p> <p>24 Do you see those topics?</p>	<p>Page 12</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Is it your understanding that</p> <p>3 Finance System of Toledo has designated you as their</p> <p>4 corporate representative to testify to topics 1</p> <p>5 through 23?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And other than any objections your</p> <p>8 counsel may make throughout these proceedings, are you</p> <p>9 able to accurately and fully testify as to topics 1</p> <p>10 through 23?</p> <p>11 A. If it's anything legal, then, no ...</p> <p>12 Q. But other than legal opinions or issues,</p> <p>13 you're able to testify to topics 1 through 23?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Thank you. I believe you can put</p> <p>16 that aside. I don't know that we'll be using that</p> <p>17 again. I'm going to ask you to take a look -- well,</p> <p>18 actually -- yeah, actually, I'll ask the court</p> <p>19 reporter to hand you what's been pre-marked as Exhibit</p> <p>20 B, as in "boy."</p> <p>21 (Deposition Exhibit B was</p> <p>22 presented to the witness.)</p> <p>23 BY MR. VOLHEIM:</p> <p>24 Q. And once you've flipped through that, let</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 14..17

<p>1 me know. I don't anticipate asking you very much 2 about this, but let me know when you're done reviewing 3 that.</p> <p>4 (Pause.)</p> <p>5 <b>THE WITNESS:</b> Okay.</p> <p>6 MR. VOLHEIM: Thank you. For 7 the record, Exhibit B is Defendant's 8 Answer to Complaint with Counterclaims.</p> <p>9 BY MR. VOLHEIM:</p> <p>10 Q. I'm going to ask you to flip to the 11 second-to-last page.</p> <p>12 A. Okay.</p> <p>13 Q. On the second-to-last page, there are 14 additional defenses. There is an additional defense 15 in No. 3 which is what I want to direct your attention 16 to.</p> <p>17 Is it your understanding that 18 Finance System of Toledo has withdrawn this defense?</p> <p>19 A. You would have to ask the attorney that.</p> <p>20 MR. VOLHEIM: Boyd, I know that 21 you had indicated that your client is 22 withdrawing affirmative -- the 23 affirmative defense of bona fide error. 24 Can you stipulate to that on the</p>	<p>Page 14</p> <p>1 record, please?</p> <p>2 MR. GENTRY: Well, because we 3 only have one claim left of use of the 4 word "interest," and the other claim had 5 been dismissed by the court, we are not 6 going to claim that an error was made.</p> <p>7 And, so, therefore, we do not 8 anticipate putting forth the defense that 9 an error was made in good faith. It is 10 our position that no error was made.</p> <p>11 So, yes, we do not intend to put 12 forth evidence of a procedure designed to 13 avoid an error, because we believe with 14 this claim there was no error.</p> <p>15 MR. VOLHEIM: Okay. And are you 16 guys going to file an amended answer or 17 something with the court withdrawing that 18 affirmative defense?</p> <p>19 MR. GENTRY: We can discuss 20 that. I had not anticipated doing that, 21 but I can certainly discuss that. I'm 22 open to doing that to make the record 23 clear.</p> <p>24 MR. VOLHEIM: Okay. Well, we're</p>
<p>Page 16</p> <p>1 going to either need to stipulate to 2 that, or we're going to need something to 3 be filed.</p> <p>4 I mean, I appreciate that 5 defendant doesn't anticipate, but 6 "anticipate," is not, as I'm sure you 7 know, a definitive response.</p> <p>8 So if you're not comfortable 9 stipulating to that right now, then I 10 guess we're going to have to -- we don't 11 need to adjourn the deposition, but I'm 12 going to adjourn any topics related to 13 policies and procedures of bona fide 14 error, because I don't know if it's 15 formally withdrawn or not.</p> <p>16 MR. GENTRY: Understood. And I 17 think that's fair for today. I won't -- 18 if something changes in the case, right, 19 and it turns out that we would rely on 20 this, some theory has changed on the 21 prosecution of the claim or something 22 like that, then I would certainly 23 understand that you would want a 24 follow-up deposition on that topic.</p>	<p>Page 17</p> <p>1 I would not argue against your 2 right to do a deposition or seek further 3 discovery as to that.</p> <p>4 But as it stands now, the way 5 the court has limited the case from what 6 it was in the beginning, we are not 7 relying on the bona fide error.</p> <p>8 MR. VOLHEIM: Okay. Thank 9 you.</p> <p>10 BY MR. VOLHEIM:</p> <p>11 Q. You can set aside Exhibit B.</p> <p>12 I'm not asking for your legal opinion in 13 any way, but what is your understanding of what my 14 client has alleged that Finance System of Toledo did 15 wrong?</p> <p>16 A. Regarding the -- the table and the 17 columns on the table.</p> <p>18 Q. And when you say "regarding the table and 19 the columns on the table," are you referring to a 20 collection correspondence that Finance System of 21 Toledo sent my client?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And more specific than that, are 24 you referring to the collection correspondence that</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 18.21

<p style="text-align: right;">Page 18</p> <p>1 Finance System of Toledo sent my client dated January 2 15th, 2018? 3     A. Can I see a copy of that? 4     Q. Of course. 5     A. Is that an exhibit somewhere? 6     Q. Yes. 7                 MR. VOLHEIM: I'll ask our court 8                 reporter to hand you what's been 9                 pre-marked as Exhibit M, as in "Mary." 10                (Deposition Exhibit M was 11                presented to the witness.) 12 BY MR. VOLHEIM: 13     Q. And when you have a chance to review 14 Exhibit M, please let me know. I think you can skip 15 the first letter, but, obviously, feel free to review 16 whatever you'd like. 17     A. Okay. 18     Okay. 19                 MR. VOLHEIM: For the record, 20                 Exhibit M is some correspondence sent by 21                 Finance System of Toledo to our client. 22 BY MR. VOLHEIM: 23     Q. I was asking you if the table you were 24 referring to appears on the January 15th, 2018,</p>	<p style="text-align: right;">Page 19</p> <p>1 correspondence. 2     A. Yes. 3     Q. Okay. Great. If you could just set that 4 aside, we're definitely going to come back to that 5 one. But if you could go ahead and set that aside. 6                 How many accounts -- how many different 7 accounts has Finance System of Toledo had in the last 8 two years with regards to my client? 9     A. I could not tell you. 10    Q. Do you know if it's more than one 11 account? 12    A. I don't know. 13    Q. Okay. I'm going to be using the 14 shorthand FDCPA. Is it your understanding or can we 15 agree that when I say FDCPA, I'm referring to the Fair 16 Debt Collection Practices Act? 17    A. Yes. 18    Q. Just for background, what is your 19 familiarity with the FDCPA? 20    A. General. 21    Q. Have you had any training with regards to 22 the FDCPA? 23    A. Just kind of self-training. 24    Q. Okay. And when you say "self-training,"</p>
<p style="text-align: right;">Page 20</p> <p>1 what does that entail? 2     A. Reviewing the FDCPA documents. 3     Q. Okay. Are you referring to the law 4 regarding the FDCPA, or what documents are you 5 referring to? 6     A. What's listed on the ACA website. 7     Q. Okay. Have you taken any class or do you 8 hold any certifications with regards to the FDCPA? 9     A. No. 10    MR. GENTRY: I'm sorry. This is 11 Boyd Gentry just rejoining. I think the 12 conference line cut me off or dropped me, 13 so I dialed in. I think I missed about a 14 minute there. I apologize for that. 15    MR. VOLHEIM: Do you need our 16 court reporter to read back the last 17 minute, or can we keep going? 18    MR. GENTRY: Jim, I guess you're 19 there on the ground. Do I need anything 20 or -- I'm not sure what happened? 21    MR. NOWAK: No, you're fine. 22 These were just some background questions 23 on her qualifications to understand the 24 FDCPA.</p>	<p style="text-align: right;">Page 21</p> <p>1                 MR. GENTRY: Okay. Go ahead. 2 BY MR. VOLHEIM: 3     Q. Okay. I'm going to ask our court 4 reporter to hand you what's -- before we get to that, 5 I'm sorry. 6                 So in your role as client liaison, do you 7 have direct contact with the entities that utilize 8 Finance System of Toledo's services? 9     A. Yes. 10    Q. And we can get into specific examples, 11 but just kind of generally, when an entity places an 12 account or accounts with Finance System of Toledo, 13 does it direct Finance System of Toledo about how it 14 wants Finance System to go about collecting on that 15 account? 16    A. It would depend. 17    Q. And what does it depend on? 18    A. The circumstance of that account or that 19 client. 20    Q. Okay. So is it fair to say different 21 clients have different circumstances or different 22 requirements about how they want Finance System of 23 Toledo to go about collecting their debt? 24    A. Yes.</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 22..25

<p>1       Q. Are those circumstances or requirements 2 outlined in any documentation? 3       A. Not necessarily. 4       Q. Okay. Are they sometimes outlined in any 5 documentation? 6       A. I really don't know, to be honest. 7       Q. Okay. So if I'm a hospital and I want 8 Finance System of Toledo to collect debt on me, is 9 there an agreement between me and Finance System of 10 Toledo? 11      A. Sometimes. 12      Q. But not always? 13      A. Correct. 14      Q. If there is an agreement, will the terms 15 of how I want my debt collected be within that 16 agreement? 17            MR. GENTRY: I'm sorry. This is 18 Boyd. I just want to, I guess, clarify. 19            Do you mean a written agreement? That's 20 what you're referring to? 21            MR. VOLHEIM: Sure. We can 22 clarify. 23 BY MR. VOLHEIM: 24      Q. If there was a written agreement, are the</p>	<p>Page 22</p> <p>1 terms of how Finance System of Toledo wants -- excuse 2 me. Strike that. 3            If there is a written agreement, will the 4 terms of how the client wants the debt collected be in 5 that written agreement? 6       A. Sometimes. 7       Q. Okay. Well, let's get more specific, 8 then, I suppose. I'm going to direct your attention 9 back to Exhibit M, and if you can grab that document 10 again and turn to the last page -- 11      A. Okay. 12      Q. -- there is a client name of EPNO, Inc., 13 Toledo. Did EPNO, Inc., Toledo engage Finance System 14 of Toledo to collect debt on its behalf against my 15 client? 16      A. Yes. 17      Q. Okay. Is there an agreement -- a written 18 agreement between EPNO, Inc., of Toledo, and -- excuse 19 me. 20            Is there a written agreement between 21 EPNO, Inc., of Toledo and Finance System of Toledo on 22 how it wants its debt collected? 23      A. No. 24      Q. Is there any written correspondence</p>
<p>Page 24</p> <p>1 between EPNO, Inc., Toledo, and Finance System of 2 Toledo on how to collect the account listed on Exhibit 3 M? 4       A. No. 5       Q. I'm going to ask you to go to -- I'm 6 going to direct your attention to what's been 7 pre-labeled or pre-marked as Exhibit F. And if our 8 court reporter could hand you that, look through 9 Exhibit F and let me know when you've had a chance to 10 review that. 11            (Deposition Exhibit F was 12 presented to the witness.) 13            THE WITNESS: Okay. 14            MR. VOLHEIM: Okay. For the 15 record, Exhibit F has been pre-labeled 16 Defendant FST Produced Account note for 17 Client EPNO Hospital ER Physician. 18 BY MR. VOLHEIM: 19      Q. Have you seen Exhibit F before today? 20      A. Yes. 21      Q. Okay. When was the first time you saw 22 Exhibit F? 23      A. I don't really remember. 24      Q. Okay. What is Exhibit F?</p>	<p>Page 25</p> <p>1       A. It appears to be a printout of the 2 account and account notes. 3       Q. Okay. When was the debt associated with 4 Exhibit F placed with Finance System of Toledo? 5       A. This account was assigned on 7-23 of '13. 6       Q. Okay. So that would be July 23rd of 7 2013? 8       A. Correct. 9       Q. Okay. Did Finance System of Toledo 10 engage in debt collection activity against my client 11 regarding this account? 12      A. Yes. 13      Q. Okay. Was this account -- when this 14 account was placed with Finance System of Toledo, what 15 was the balance of the account? 16      A. The assigned amount was 66.37. 17      Q. How much interest was assigned -- how 18 much interest was assigned on this account at 19 placement? 20      A. Zero. 21      Q. How much in attorney fees was assigned 22 with this account at placement? 23      A. Zero. 24      Q. How much court costs was assigned with --</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 26.29

<p style="text-align: right;">Page 26</p> <p>1 at placement with this account?</p> <p>2     A. Zero.</p> <p>3     Q. Okay. How much miscellaneous fees was</p> <p>4 assigned with this account at placement?</p> <p>5     A. Zero.</p> <p>6     Q. How much contingency fees was assigned</p> <p>7 with this account at placement?</p> <p>8     A. Zero.</p> <p>9     Q. Was there any amount added to the balance</p> <p>10 on this account at any time that Finance System of</p> <p>11 Toledo had the account other than 66.37?</p> <p>12            MR. GENTRY: Objection.</p> <p>13            Go ahead and answer.</p> <p>14            MR. VOLHEIM: Just for clarity,</p> <p>15            Boyd, what is your objection?</p> <p>16            MR. GENTRY: As to -- you say</p> <p>17            was there any amount added to this, and I</p> <p>18            think it's a vague question about how the</p> <p>19            \$66.37 was derived. That's how I</p> <p>20            understood it.</p> <p>21            MR. VOLHEIM: Okay. Let me try</p> <p>22            to clean it up, then.</p> <p>23 BY MR. VOLHEIM:</p> <p>24     Q. The assigned amount, 66.37, that was the</p>	<p style="text-align: right;">Page 27</p> <p>1 amount that was put with Finance System of Toledo at</p> <p>2 placement; is that correct?</p> <p>3     A. Correct.</p> <p>4     Q. Okay. What does that amount -- what is</p> <p>5 that comprised of?</p> <p>6     A. The balance that EPNO sent over. I don't</p> <p>7 have the details.</p> <p>8     Q. So was any amount -- from the time</p> <p>9 Finance System of Toledo received this account until</p> <p>10 the time the account was satisfied, was any amount</p> <p>11 added to the balance?</p> <p>12     A. I cannot be certain.</p> <p>13     Q. If any amount was added to the balance,</p> <p>14 would it be reflected in these account notes?</p> <p>15     A. Yes.</p> <p>16     Q. Okay. In reviewing these account notes,</p> <p>17 can you see any amount added to the balance of 66.37?</p> <p>18     A. No.</p> <p>19     Q. Okay. When was -- how long was this</p> <p>20 account with Finance System of Toledo?</p> <p>21     A. How long was it with Finance System of</p> <p>22 Toledo?</p> <p>23     Q. Yes.</p> <p>24     A. Since its assigned date of 7-23 of '13.</p>
<p style="text-align: right;">Page 28</p> <p>1     Q. Okay. So was this account satisfied in</p> <p>2 any way?</p> <p>3     A. The balance was paid.</p> <p>4     Q. Who was the balance paid by?</p> <p>5     A. There was a 20 dollar payment made to the</p> <p>6 client, to EPNO, and two payments made to</p> <p>7 Finance System of Toledo.</p> <p>8     Q. Okay. When was the last payment made to</p> <p>9 Finance System of Toledo?</p> <p>10    A. 10-24 of '17.</p> <p>11    Q. And when that last payment was made to</p> <p>12 Finance System of Toledo, what was the remaining</p> <p>13 balance on the account?</p> <p>14    A. Zero.</p> <p>15    Q. Okay. Was the account closed at that</p> <p>16 time?</p> <p>17    A. No.</p> <p>18    Q. Okay. Why was the account not closed if</p> <p>19 the balance was paid in full?</p> <p>20    A. Because the account is paid in full.</p> <p>21 It's zero.</p> <p>22    Q. Okay. So does Finance System of Toledo</p> <p>23 keep all the accounts that it has, whether they're</p> <p>24 paid or not?</p>	<p style="text-align: right;">Page 29</p> <p>1     A. Correct.</p> <p>2     Q. And what purpose does it keep them for?</p> <p>3     A. The consumer. You know, we like to keep</p> <p>4 accurate records, and the consumer likes to see what</p> <p>5 has been paid on -- you know, what's in our system.</p> <p>6     Q. And now you're speaking -- when you say</p> <p>7 "consumer," are you speaking in general, or are you</p> <p>8 speaking to my client, Robie Gaston?</p> <p>9     A. In general.</p> <p>10    Q. Okay. Did my client, Robie Gaston, ever</p> <p>11 ask Finance System of Toledo to keep the account, this</p> <p>12 account open?</p> <p>13    A. I wouldn't know.</p> <p>14    Q. Okay. Is there anything reflected in</p> <p>15 these account notes that states my client asked</p> <p>16 Finance System of Toledo to keep this account open?</p> <p>17    A. I did not see that.</p> <p>18    Q. Okay. So going back to it, my client</p> <p>19 paid this account in full on October 24th, 2017; is</p> <p>20 that correct?</p> <p>21    A. His final payment, yes, 10-24 of '17.</p> <p>22    Q. And after that payment, the balance was</p> <p>23 zero?</p> <p>24    A. Correct.</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 30..33

<p style="text-align: right;">Page 30</p> <p>1           MR. GENTRY: This is Boyd. I'm 2       not sure why you're spending so much time 3       on an account that is not at issue in 4       your remaining claim, which is the second 5       letter of Exhibit M, right? The only 6       thing left --</p> <p>7           MR. VOLHEIM: It's background. 8           MR. GENTRY: The only thing 9       relevant is the January 2018 letter. 10          MR. VOLHEIM: Right. And this 11       account is reflected on the January 2018 12       letter.</p> <p>13          MR. GENTRY: The 66 dollar 14       account is?</p> <p>15          MR. VOLHEIM: Yeah, Boyd, it is. 16       Why don't you look at line F -- or excuse 17       me, the top line of the January 15th, 18       2018, letter.</p> <p>19          MR. GENTRY: I'm sorry. I 20       misunderstood you. Go ahead.</p> <p>21 BY MR. VOLHEIM:</p> <p>22          Q. Okay. So your counsel is actually going 23       to make my point for me here. Excuse me. Strike 24       that.</p>	<p style="text-align: right;">Page 31</p> <p>1           If this account was closed -- excuse me. 2       Strike that.</p> <p>3           If this account was paid in full on 4       October 24th, 2017, then why is it listed on the 5       correspondence sent by Finance System of Toledo of 6       January 15th, 2018?</p> <p>7          <b>A. Because we provide accurate records for 8       our consumers.</b></p> <p>9          Q. So based on that testimony, then, is it 10       fair to say that any account my client ever had with 11       Finance System of Toledo, whether it was paid or not, 12       would be listed on this January 15th, 2018, letter?</p> <p>13          <b>A. No.</b></p> <p>14          Q. Okay. Well, how does Finance System of 15       Toledo determine which accounts will be listed and 16       which ones won't?</p> <p>17          <b>A. It depends when it was paid; it depends 18       on the list of accounts that were being worked at that 19       particular time. There is a lot of variables.</b></p> <p>20          Q. Okay. Well, I'm going to need to push 21       back on that. I'm going to need to understand these 22       variables.</p> <p>23          So at what point, how long -- if an 24       account's paid, how long would Finance System of</p>
<p style="text-align: right;">Page 32</p> <p>1 Toledo continue to send correspondence regarding that 2 account?</p> <p>3          <b>A. It truly depends. It just truly depends.</b></p> <p>4          Q. No, I understand it depends. But I'm 5 trying to understand what it depends on.</p> <p>6          <b>A. If I use --</b></p> <p>7           MR. GENTRY: Wait a minute, 8       Nancy, that's not a question. Please 9       wait for a question.</p> <p>10         <b>THE WITNESS:</b> Okay.</p> <p>11         MR. GENTRY: He said he's trying 12       to understand what it depends on, but 13       that's not a question. Let him formulate 14       a question, please.</p> <p>15 BY MR. VOLHEIM:</p> <p>16          Q. What does it depend on?</p> <p>17          <b>A. Again, there are many variables.</b></p> <p>18          Q. Okay. I believe you stated one of those 19       variables is when the debt is paid; is that correct?</p> <p>20          <b>A. I'm going to use -- yes. But I will use 21       the example of the accounts that are on that table.</b></p> <p>22          Q. Okay. So let's start with the top one, 23 EPNO, Inc., of Toledo.</p> <p>24          <b>A. Okay.</b></p>	<p style="text-align: right;">Page 33</p> <p>1          Q. That account, as you testified, was paid 2       on October 24th, 2017. So my question is how long, 3       after an account is paid in full, will Finance System 4       of Toledo still continue to send correspondence on it?</p> <p>5          <b>A. In using this example of this table, the 6       accounts that are paid on this table will remain there 7       until the other accounts are paid. They're worked as 8       a group.</b></p> <p>9          Q. Okay. Let me make sure I understand 10       that. If you go down to the second account included 11       in the January 15th, 2018, letter, there is an account 12       for Allstar Disposal.</p> <p>13          What does Allstar Disposal have to do 14       with any of the other accounts on this list?</p> <p>15          <b>A. It was a debt that was owed.</b></p> <p>16          Q. Okay. Who was it owed to?</p> <p>17          <b>A. Allstar Disposal.</b></p> <p>18          Q. Based on your knowledge, does Allstar 19       Disposal have any relationship whatsoever with Toledo 20 Clinic, Inc.?</p> <p>21          <b>A. No.</b></p> <p>22          Q. Based on your knowledge, does Allstar 23 Disposal have any relationship at all with EPNO, Inc., 24 of Toledo?</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 34.37

<p style="text-align: right;">Page 34</p> <p>1     <b>A. Not to my knowledge, no.</b>      2     Q. So if Allstar Disposal, to your      3 knowledge, doesn't have any relationship with those      4 entities, why is it included on this list?      5     <b>A. Because the accounts are grouped</b>      6 <b>together.</b>      7     Q. Who groups them together?      8     <b>A. Our software.</b>      9     Q. Who makes the decision to have your      10 software group them together?      11    <b>A. A collector.</b>      12    Q. Finance System of Toledo?      13    <b>A. Yes.</b>      14    Q. Okay. So is it your testimony that any      15 account on this letter with a zero balance is included      16 because the collector decided to group those accounts      17 together?      18    <b>A. Okay. Can you repeat that again?</b>      19            MR. VOLHEIM: Sure. Ms. Court      20            Reporter, can you please read back that      21            question.      22            (Court Reporter read back the      23            following:      24            "Question: So is it your</p>	<p style="text-align: right;">Page 35</p> <p>1     testimony that any account on this letter      2 with a zero balance is included because      3 the collector decided to group those      4 accounts together?"      5     <b>THE WITNESS: Yes.</b>      6     BY MR. VOLHEIM:      7     Q. And why did a collector decide to group      8 these accounts together?      9     <b>A. As I stated, they work the accounts</b>      10 <b>together.</b>      11    Q. What is the name of the collector that      12 was working these accounts?      13    <b>A. There were probably several.</b>      14    Q. Okay. So if there were several      15 collectors working this account, which one made the      16 decision to group them together?      17    <b>A. I can't tell you exactly.</b>      18    Q. Did Finance System of Toledo group these      19 accounts together with the permission of Allstar      20 Disposal?      21    <b>A. I don't know.</b>      22    Q. Did Finance System of Toledo group these      23 accounts together with the permission of Toledo      24 Clinic, Inc.?</p>
<p style="text-align: right;">Page 36</p> <p>1     <b>A. I don't know.</b>      2     Q. Did Finance System group these accounts      3 together with the permission of EPNO, Inc.      4     <b>A. I do not know.</b>      5     Q. Does Finance System of Toledo have any      6 records, either written or otherwise, which would tell      7 you if they had permission to group these accounts      8 together?      9     <b>A. Not to my knowledge.</b>      10    Q. So did my client -- other than the debts      11 listed or the accounts listed on the January 15th,      12 2018, correspondence, did my client have any other      13 accounts placed with Finance System of Toledo?      14    <b>A. I really don't know.</b>      15    MR. VOLHEIM: Okay. I'm going      16 to ask you to turn to what's been      17 pre-marked as Exhibit L.      18    (Deposition Exhibit L was      19 presented to the witness.)      20    <b>THE WITNESS: Okay.</b>      21 BY MR. VOLHEIM:      22    Q. Exhibit L is Defendant Finance System of      23 Toledo Produced Account Notes for Various Accounts.      24    Have you seen Exhibit L before today?</p>	<p style="text-align: right;">Page 37</p> <p>1     <b>A. Yes.</b>      2     Q. When did you first see Exhibit L?      3     <b>A. I don't remember.</b>      4     Q. Okay. What is Exhibit L?      5     <b>A. It's the -- what we refer to as a header</b>      6 <b>account.</b>      7     Q. And for clarity, what is a header      8 account?      9     <b>A. It's the main account that holds the --</b>      10 <b>holds the listing of accounts.</b>      11    Q. Okay. And what -- would this header      12 account have listed all the accounts that      13 Finance System of Toledo had with respect to my      14 client?      15    <b>A. Not necessarily.</b>      16    Q. Okay. What -- what accounts would not be      17 listed there?      18    <b>A. If he had other accounts that were paid</b>      19 <b>and were not -- were not in this time frame, you know.</b>      20    MR. VOLHEIM: All right. Just      21 one moment, please.      22    MR. GENTRY: Nancy, do you need      23 a break? We have been going for about an      24 hour now.</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 38..41

<p style="text-align: right;">Page 38</p> <p>1           <b>THE WITNESS:</b> No, I'm okay. 2       Thank you. 3           MR. GENTRY: Okay. Speak up if 4       you do. Just speak up. 5           <b>THE WITNESS:</b> Okay.</p> <p>6 BY MR. VOLHEIM: 7       Q. In reviewing Exhibit L -- strike that. 8       Now, in reviewing Exhibit L, are there 9       any accounts that Finance System of Toledo had placed 10      with it regarding my client that are not listed on 11      Exhibit -- excuse me, the ledger that we have been 12      speaking about? 13        MR. GENTRY: Objection. I'm 14      not sure I understand that. 15        Go ahead if you understand that, 16      Nancy. 17        <b>THE WITNESS:</b> No, I was going to 18      ask if you could rephrase it or repeat 19      it. 20 BY MR. VOLHEIM: 21       Q. Okay. So you're going to have to look at 22      both Exhibit M and Exhibit L together. Directing your 23      attention to Exhibit M, there are five accounts listed 24      on the ledger we have been speaking about.</p>	<p style="text-align: right;">Page 39</p> <p>1       Do you agree with me on that? 2       A. Correct. 3       Q. Okay. Other than those five accounts, 4       are there any other accounts placed with 5       Finance System of Toledo regarding my client that was 6       listed in Exhibit L? 7       A. I don't know. 8           MR. GENTRY: I believe your 9       question was in the affirmative, that 10      "are" listed, is that what you said, or 11      "are not"? I wasn't sure if that was a 12      contraction. 13 BY MR. VOLHEIM: 14       Q. Does Exhibit L contain any accounts that 15      are not listed on Exhibit M? 16       A. I don't know. 17       Q. Okay. Well, can you -- would reviewing 18      Exhibit L tell you the answer to that question? 19       A. Not necessarily. 20       Q. Okay. Why is that? 21       A. Because the accounts -- there are a 22      different set of account numbers that -- what I have 23      in Exhibit L is just a header number, and -- and 24      notes, and I don't have the actual trailer numbers</p>
<p style="text-align: right;">Page 40</p> <p>1       <b>that fall under the header number for each of those 2       accounts on the list in M.</b> 3       Q. Is there a document that would say the 4       trailer numbers? 5       A. No, not to my knowledge. 6       Q. So how would Finance System of Toledo 7       know which accounts are tied in with the header 8       account? 9        MR. GENTRY: You mean the 10      particular header account you're talking 11      about, right, the record? 12       MR. VOLHEIM: Yes. 13       <b>THE WITNESS:</b> So it would be 14      the -- the account numbers that would be 15      associated with the -- the client's 16      account number. I would have to look it 17      up. 18 BY MR. VOLHEIM: 19       Q. Would EPNO, Inc., of Toledo have a 20      different client account number than Allstar Disposal? 21       A. Yes. 22       Q. Would those numbers -- would EPNO and 23      Allstar's client account numbers be different than 24      that of Toledo Clinic, Inc.?</p>	<p style="text-align: right;">Page 41</p> <p>1       A. Yes. 2       Q. Would there be header account notes for 3       each of those clients regarding my client? 4       A. That's -- yes. That's what Exhibit L is. 5       Q. Did my client request to be sent the 6       correspondence dated January 15th, 2018? 7       A. I will have to read through these notes. 8           (Pause.) 9       <b>THE WITNESS:</b> I do not see that, 10      no. 11 BY MR. VOLHEIM: 12       Q. Okay. So if an account is paid in 13      full -- I'll direct your attention to January 15th, 14      2018, correspondence, Exhibit M. Would you agree with 15      me that there are three different accounts listed on 16      this correspondence -- correspondence, which are paid 17      in full? 18        MR. GENTRY: Object to the 19      form. It appears there were two 20      questions in one. 21 BY MR. VOLHEIM: 22       Q. On the Exhibit M correspondence are there 23      three different accounts which have been paid in full 24      listed?</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 42.45

Page 42	Page 43
<p>1 A. Yes.</p> <p>2 Q. And those three accounts are from three</p> <p>3 different creditors; is that correct?</p> <p>4 A. EPNO, Allstar, and Toledo Clinic, yes.</p> <p>5 Q. If those three accounts were paid in</p> <p>6 full, then why were they listed on the January 15th,</p> <p>7 2018, correspondence?</p> <p>8 A. Because it's giving him an accurate</p> <p>9 description of the account history.</p> <p>10 Q. Is it your testimony that any</p> <p>11 correspondence which Finance System of Toledo sends,</p> <p>12 it will give an update of any accounts that are placed</p> <p>13 with it?</p> <p>14 MR. GENTRY: Objection. Asked</p> <p>15 and answered.</p> <p>16 BY MR. VOLHEIM:</p> <p>17 Q. You can answer.</p> <p>18 MR. GENTRY: Go ahead, Nancy.</p> <p>19 THE WITNESS: You're saying</p> <p>20 "any," so it's very broad and ...</p> <p>21 MR. GENTRY: She already</p> <p>22 testified to this. I'm not --</p> <p>23 MR. VOLHEIM: Boyd, with all</p> <p>24 respect, I'm not interested in your</p>	<p>1 testimony. Thank you.</p> <p>2 BY MR. VOLHEIM:</p> <p>3 Q. Who sent the letter dated January 15th,</p> <p>4 2018?</p> <p>5 A. Who sent it?</p> <p>6 Q. Correct.</p> <p>7 A. It was generated and sent by Finance</p> <p>8 System and our mail service.</p> <p>9 Q. And who is Finance System of Toledo's</p> <p>10 mail service that sent this letter?</p> <p>11 A. Renkim.</p> <p>12 Q. How long has Renkim been the letter</p> <p>13 sender for Finance System of Toledo?</p> <p>14 A. I'm going to say over five years. I</p> <p>15 can't give you a definite.</p> <p>16 Q. Sure. And in that five-year period,</p> <p>17 approximately, has Renkim been the exclusive</p> <p>18 letter-sender of Finance System of Toledo?</p> <p>19 A. Yes.</p> <p>20 Q. Does Renkim send its letters at the</p> <p>21 direction and benefit of Finance System of Toledo?</p> <p>22 A. Yes.</p> <p>23 Q. Does Renkim send -- strike that.</p> <p>24 So it is your testimony that</p>
Page 44	Page 45
<p>1 Finance System of Toledo created -- or, excuse me,</p> <p>2 decided what went into the letter dated January 15th,</p> <p>3 2018?</p> <p>4 A. Yes.</p> <p>5 Q. Who at Finance System of Toledo decided</p> <p>6 that?</p> <p>7 A. It's a management decision.</p> <p>8 Q. Okay. Who -- do you know what</p> <p>9 individuals in management would have made that</p> <p>10 decision?</p> <p>11 A. It would have been myself, Amy Pfeiffer,</p> <p>12 and Randy Parker.</p> <p>13 Q. Okay. And what is Mr. Parker's title?</p> <p>14 A. He's the owner.</p> <p>15 Q. Okay. And I do not want to know the</p> <p>16 contents of any communications you would have had with</p> <p>17 an attorney, but did an attorney assist in preparing</p> <p>18 the template used for the January 15th, 2018,</p> <p>19 correspondence?</p> <p>20 A. Rephrase that a little bit for me.</p> <p>21 Q. Sure. I want to be very clear. I do not</p> <p>22 want to know about the substance of any conversations</p> <p>23 that you or Finance System of Toledo had with any</p> <p>24 attorney.</p>	<p>1 A. Uh-huh.</p> <p>2 Q. However, my question is did an attorney</p> <p>3 at any point review the template used for the January</p> <p>4 15th, 2018, correspondence?</p> <p>5 A. Yes.</p> <p>6 Q. Did the attorney review that prior to the</p> <p>7 January 15th, 2018, correspondence being sent?</p> <p>8 A. No.</p> <p>9 Q. Mr. Parker, to your knowledge, is he an</p> <p>10 attorney?</p> <p>11 A. No.</p> <p>12 Q. To your knowledge, does Mr. Parker own</p> <p>13 any -- excuse me. Strike that.</p> <p>14 To your knowledge, does Mr. Parker have</p> <p>15 any certification or special training with regards to</p> <p>16 the FDCPA?</p> <p>17 A. Not to my knowledge.</p> <p>18 Q. Okay. To your knowledge, does -- and,</p> <p>19 again, I apologize if I mispronounce this. Does</p> <p>20 Ms. Pfeiffer, is she an attorney?</p> <p>21 A. No.</p> <p>22 Q. To your knowledge, does Ms. Pfeiffer have</p> <p>23 any advanced training or certification when it comes</p> <p>24 to the Fair Debt Collection Practices Act?</p>

**ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO**  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 46..49

<p>1 A. Not to my knowledge.</p> <p>2 Q. Would anyone other than yourself,</p> <p>3 Ms. Pfeiffer, or Mr. Parker have reviewed the template</p> <p>4 used to send -- the template used for the January</p> <p>5 15th, 2018, correspondence prior to it being sent?</p> <p>6 A. Let me see if I understand your question.</p> <p>7 Q. Of course.</p> <p>8 A. When we create letters, are you asking if</p> <p>9 someone other than the three of us review them before</p> <p>10 they go to print?</p> <p>11 Q. Yeah. We can start more generally, yes.</p> <p>12 That would be my question.</p> <p>13 A. Okay. Yes, someone does.</p> <p>14 Q. Okay. Who else would review the</p> <p>15 templates before they go to print?</p> <p>16 A. James Nowak.</p> <p>17 Q. Okay. Regarding specifically the</p> <p>18 template used for the January 15th, 2018, letter, did</p> <p>19 anyone other than yourself, Mr. Parker, or</p> <p>20 Ms. Pfeiffer review the template prior to it being</p> <p>21 sent?</p> <p>22 A. I don't know.</p> <p>23 Q. Do you know whether or not Mr. Nowak</p> <p>24 reviewed the template for the January 15th, 2018,</p>	<p>Page 46</p> <p>1 letter prior to it being sent?</p> <p>2 A. I wouldn't know.</p> <p>3 Q. Okay. I'm going to ask you to pull out</p> <p>4 what's been pre-marked as Exhibit G, as in "girl."</p> <p>5 A. G.</p> <p>6 Q. G as in "girl."</p> <p>7 (Deposition Exhibit G was</p> <p>8 presented to the witness.)</p> <p>9 THE WITNESS: Okay.</p> <p>10 MR. VOLHEIM: For the record,</p> <p>11 Exhibit G is Defendant Finance System of</p> <p>12 Toledo Produced Accounts Notes for Client</p> <p>13 Allstar Disposal and Recycling.</p> <p>14 BY MR. VOLHEIM:</p> <p>15 Q. Have you seen Exhibit G before today?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. What is Exhibit G?</p> <p>18 A. It is the printout of the Allstar</p> <p>19 Disposal account.</p> <p>20 Q. Okay. When was that account placed with</p> <p>21 Finance System of Toledo?</p> <p>22 A. 5-18 of '15.</p> <p>23 Q. And when was that account satisfied?</p> <p>24 A. That was 7-27 of '17.</p>
<p>Page 48</p> <p>1 Q. Okay. And what was the balance on the</p> <p>2 date that this account was assigned?</p> <p>3 A. 157 dollars.</p> <p>4 Q. Okay. How much interest was placed --</p> <p>5 strike that.</p> <p>6 How much interest was on this account</p> <p>7 when it was placed with Finance System of Toledo?</p> <p>8 A. Zero.</p> <p>9 Q. Is it fair to say -- for time</p> <p>10 constraints, is it fair to say that zero dollars in</p> <p>11 interest, attorney fees, court fees, miscellaneous</p> <p>12 fees, contingency fees, all of that would be zero at</p> <p>13 the time of placement with Finance System of Toledo?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. What date was this account -- and</p> <p>16 I think you -- I apologize. I know you stated it, but</p> <p>17 just for clarity, this account was satisfied on July</p> <p>18 27th, 2017?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. When this account was satisfied on</p> <p>21 July 27th, 2017, had any interest, attorney's fees,</p> <p>22 court costs, contingency fees, miscellaneous fees, had</p> <p>23 anything been added to the balance at the time the</p> <p>24 debt was satisfied?</p>	<p>Page 48</p> <p>1 A. No.</p> <p>2 Q. Okay. So in the approximately two years</p> <p>3 and two months that this account -- from the time this</p> <p>4 account was placed with Finance System of Toledo to</p> <p>5 the time it was satisfied, nothing had been added to</p> <p>6 the balance?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. When this account was placed by</p> <p>9 Allstar Disposal, did it direct Finance System of</p> <p>10 Toledo as to whether or not it should collect</p> <p>11 interest?</p> <p>12 A. I don't know.</p> <p>13 Q. Is there a written agreement between</p> <p>14 Allstar Disposal and Recycling and Finance System of</p> <p>15 Toledo that would cover collection of this debt?</p> <p>16 A. No.</p> <p>17 Q. Was there any direction or communication,</p> <p>18 whether verbal or not -- excuse me, whether written,</p> <p>19 verbal, or otherwise, as to how Finance System of</p> <p>20 Toledo should collect this Allstar Disposal and</p> <p>21 Recycling account?</p> <p>22 A. No.</p> <p>23 Q. At the time that Finance System of Toledo</p> <p>24 sent the January 15th, 2018, correspondence, had it</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 50.53

<p style="text-align: right;">Page 50</p> <p>1 added any interest or other fees regarding the Allstar 2 Disposal account?</p> <p>3       A. No.</p> <p>4       Q. At the time it sent the January 15, 2018, 5 correspondence, did it have the legal ability to add 6 any interest or other fees?</p> <p>7       A. I don't know.</p> <p>8                  MR. GENTRY: Objection as to 9                  legal ability.</p> <p>10 BY MR. VOLHEIM:</p> <p>11      Q. At the time Finance System of Toledo sent 12 the January 15, 2018, correspondence, did it have any 13 intention of adding any interest or other charges of 14 any kind to the Allstar Disposal account?</p> <p>15                  MR. GENTRY: Objection as to 16                  the "it." I think "it" as the subject is 17                  vague.</p> <p>18 BY MR. VOLHEIM:</p> <p>19      Q. Did you understand my question, ma'am?</p> <p>20      A. Can you say it over?</p> <p>21      Q. Sure. Of course. At the time 22 Finance System of Toledo sent the January 15th, 2018, 23 correspondence, did Finance System of Toledo have any 24 intention of adding -- excuse me, of collecting</p>	<p style="text-align: right;">Page 51</p> <p>1 interest or other fees regarding the Allstar Disposal 2 account against my client?</p> <p>3       A. I'm not sure.</p> <p>4       Q. Okay. The account was paid in full -- 5 excuse me, strike that.</p> <p>6                  The account was satisfied in full, 7 correct?</p> <p>8       A. Yes.</p> <p>9       Q. So you're not sure if Finance System of 10 Toledo was going to collect any amount on this account 11 going forward?</p> <p>12                  MR. GENTRY: Objection. That 13 wasn't the question.</p> <p>14                  But you can answer that 15 question.</p> <p>16                  THE WITNESS: Zero is zero, 17 so ...</p> <p>18 BY MR. VOLHEIM:</p> <p>19      Q. So can I take from your answer that 20 Finance System of Toledo has no intention of 21 collecting anything further on the Allstar Disposal 22 account?</p> <p>23                  MR. GENTRY: Objection as to 24 form when you use the word "further."</p>
<p style="text-align: right;">Page 52</p> <p>1                  Go ahead.</p> <p>2                  THE WITNESS: The client settled 3                  that account in full so ...</p> <p>4 BY MR. VOLHEIM:</p> <p>5      Q. Okay. So does Finance System of Toledo 6 collect debts that are resolved in full?</p> <p>7       A. No.</p> <p>8      Q. Okay. And so the Allstar Disposal debt 9 was resolved in full, correct?</p> <p>10     A. Correct.</p> <p>11     Q. Okay. And it was resolved in full by the 12 time the January 15th, 2018, correspondence was sent?</p> <p>13     A. Correct.</p> <p>14     Q. Okay. So my question, again, at the time 15 that correspondence was sent, did Finance System of 16 Toledo have any intent of collecting any further 17 amount, whether for balance, interest, attorney fees, 18 or other from my client?</p> <p>19     A. No.</p> <p>20     MR. GENTRY: Objection. Asked 21       and answered.</p> <p>22 BY MR. VOLHEIM:</p> <p>23     Q. For the record, can you repeat your 24 answer, please?</p>	<p style="text-align: right;">Page 53</p> <p>1       A. It -- no.</p> <p>2       Q. I'm going to ask you to turn to what's 3 been pre-marked Exhibit I. 4                  (Deposition Exhibit I was 5 presented to the witness.)</p> <p>6                  THE WITNESS: Okay. Can we take 7 a few-minute break here?</p> <p>8                  MR. VOLHEIM: Of course, how 9 long would you like?</p> <p>10                  THE WITNESS: 10 minutes, 5, 10 11 minutes.</p> <p>12                  MR. VOLHEIM: That sounds great. 13 We'll pick back up at 12:35. How about 14 that?</p> <p>15                  THE WITNESS: Agree. Thank you. 16                  (A brief recess was had.)</p> <p>17 BY MR. VOLHEIM:</p> <p>18     Q. We just took a break. During that 19 break -- I don't want to know the substance of any 20 conversation you had, but did you speak to anybody 21 about your testimony here today?</p> <p>22     A. No.</p> <p>23     Q. Okay. And you understand that we are 24 back under oath; is that correct?</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 54..57

<p>1      A. Yes.</p> <p>2      Q. Okay. So where we left off, I think I 3 was asking you to take a look at what's been 4 pre-marked Exhibit I as in "igloo."</p> <p>5      Could you go ahead and pull that document 6 out.</p> <p>7      A. Yes, I have it here.</p> <p>8      Q. Great. And have you seen this document 9 before today?</p> <p>10     A. Yes.</p> <p>11     MR. VOLHEIM: For the record, 12     Exhibit I is Defendant Finance System of 13     Toledo Produced Accounts Notes for Toledo 14     Clinic, Inc., Reference No. 27962730001.</p> <p>15 BY MR. VOLHEIM:</p> <p>16     Q. Is this an account that was placed by 17 Toledo Clinic with Finance System to collect with 18 regards to my client?</p> <p>19     A. Yes.</p> <p>20     Q. And what was the date of placement?</p> <p>21     A. May 6th of '16.</p> <p>22     Q. Okay. And what was the balance when this 23 was first placed with Finance System of Toledo?</p> <p>24     A. \$768.93.</p>	<p>Page 54</p> <p>1      Q. Okay. And is there -- as we currently 2 sit today, is still there a balance on this account?</p> <p>3      A. Yes.</p> <p>4      Q. Okay. And what is that balance?</p> <p>5      A. \$734.16.</p> <p>6      Q. Okay. So the balance is slightly less 7 than when it was assigned to Finance System; is that 8 correct?</p> <p>9      A. Correct.</p> <p>10     Q. Okay. And is that the result of a 11 payment being made?</p> <p>12     A. Yes.</p> <p>13     Q. Okay. When was the payment made?</p> <p>14     A. 10-24-17.</p> <p>15     Q. Okay. And do you know who paid that 16 payment?</p> <p>17     A. I can tell you it was made to Finance 18 System, but, no, I do not know who made it.</p> <p>19     Q. Okay. So you're not aware whether or 20 not, excuse me, my client was the one who made that 21 payment?</p> <p>22     A. No, I don't really know.</p> <p>23     Q. Okay. Would the party who made the 24 payment be listed in these account notes?</p>
<p>1      A. Possibly, but I don't -- let me look.</p> <p>2      Q. I guess I'll direct your attention 3 through these account notes, and I believe it's on the 4 same page. There is a couple of entries from 5 10-24-2017, about the middle of the last page. 6      Do you see those entries?</p> <p>7      A. Let me flip there. 10-24 of '17, yes.</p> <p>8      Q. Okay. Does anything in those two entries 9 tell you who made the payment?</p> <p>10     A. No.</p> <p>11     Q. Okay. So I know we established this on 12 the other accounts, but just for clarity, at the date 13 that this account was placed with Finance System of 14 Toledo, there was no interest, attorney fees, court 15 costs, judgment interests, miscellaneous fees, or 16 contingency fees at placement; is that correct?</p> <p>17     A. That is correct.</p> <p>18     Q. Okay. And as the balance currently sits, 19 to your knowledge, have any of those fees that I just 20 listed been added to the balance?</p> <p>21     A. Not to my knowledge.</p> <p>22     Q. Okay. Directing your attention back to 23 Exhibit M, with respect to this account, which would 24 be the third from the -- which would be the middle</p>	<p>Page 55</p> <p>1      account, at the time the January 15th, 2018, letter 2 was sent, what was the principal balance?</p> <p>3      A. 734.16.</p> <p>4      Q. Okay. And how much interest was added at 5 the time the letter was sent?</p> <p>6      A. Zero.</p> <p>7      Q. And how much under the category of Other 8 was Finance System of Toledo seeking to collect?</p> <p>9      A. As a snapshot of this letter?</p> <p>10     Q. Correct.</p> <p>11     A. 734.16 on that account.</p> <p>12     Q. Okay. From January 15th, 2018, to the 13 current, has any additional amount been added to the 14 value of \$734.16?</p> <p>15     A. No.</p> <p>16     Q. At the time the January 15th, 2018, 17 correspondence was sent, did Finance System of Toledo 18 intend to add any interest with regards to this 19 account?</p> <p>20     A. This is a snapshot at that time, so no.</p> <p>21     Q. Did Finance System of Toledo, at the time 22 this letter was sent, intend to add any other charges 23 when this correspondence was sent?</p> <p>24     A. Again, it's a snapshot at this time of</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 58.61

<p>1 zero.</p> <p>2 Q. So is the answer no?</p> <p>3 A. No.</p> <p>4 Q. I'm sorry. Just for clarity, you're</p> <p>5 agreeing with me that the answer is no?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. I think we got that clear.</p> <p>8 So with respect -- with respect to this</p> <p>9 letter, would you agree with me that the term</p> <p>10 "principal" is pretty clear as to what the meaning of</p> <p>11 the word "principal" is?</p> <p>12 MR. GENTRY: Objection.</p> <p>13 Go ahead.</p> <p>14 THE WITNESS: Yeah, to me.</p> <p>15 BY MR. VOLHEIM:</p> <p>16 Q. Okay. What does it mean to you?</p> <p>17 A. It means that's the balance due.</p> <p>18 Q. Okay. Next column over, Interest, what</p> <p>19 does that mean to you?</p> <p>20 A. Interest. It means additional monies.</p> <p>21 Q. Okay. Next column over, what does the</p> <p>22 term "Other" mean to you?</p> <p>23 A. It could be anything else.</p> <p>24 Q. It could be anything else?</p>	<p>Page 58</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Is there anything in this</p> <p>3 correspondence from January 15th, 2018, which defines</p> <p>4 what the word "Other" entails?</p> <p>5 A. No, it doesn't.</p> <p>6 Q. I'm sorry. Go ahead. I did not mean to</p> <p>7 cut you off.</p> <p>8 A. No, no. That's fine. Go ahead.</p> <p>9 Q. Okay. I believe your answer was no,</p> <p>10 correct?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. How would a consumer receiving</p> <p>13 this letter dated January 15th, 2018, know what was</p> <p>14 comprised in the word "Other"?</p> <p>15 A. It's zero.</p> <p>16 MR. GENTRY: Objection.</p> <p>17 Go ahead, Nancy. Go ahead.</p> <p>18 THE WITNESS: It's zero. Just</p> <p>19 "zero" means zero.</p> <p>20 BY MR. VOLHEIM:</p> <p>21 Q. Okay. Is there anything in this</p> <p>22 correspondence which states what could be added under</p> <p>23 the category of Other?</p> <p>24 A. No.</p>
<p>1 Q. At the time this correspondence was</p> <p>2 sent -- strike that.</p> <p>3 With regards to this account ending in</p> <p>4 001 -- and actually, strike that.</p> <p>5 With regards to the account, client</p> <p>6 reference number 27962730001, was there -- is there or</p> <p>7 was there an agreement between Finance System of</p> <p>8 Toledo and Toledo Clinic, Inc., regarding the</p> <p>9 collection of this account?</p> <p>10 MR. GENTRY: You mean written</p> <p>11 agreement or just any agreement?</p> <p>12 MR. VOLHEIM: Thank you. Let's</p> <p>13 start with written.</p> <p>14 BY MR. VOLHEIM:</p> <p>15 Q. Was there any written agreement which</p> <p>16 would cover the collection of this account?</p> <p>17 A. No.</p> <p>18 Q. Is there any written agreement or</p> <p>19 correspondence in which Finance System of Toledo</p> <p>20 directed -- strike that. I'm confusing my parties.</p> <p>21 Is there any correspondence, whether</p> <p>22 written or otherwise, in which Finance System of</p> <p>23 Toledo was instructed by Toledo Clinic, Inc., on how</p> <p>24 to collect on this debt?</p>	<p>Page 60</p> <p>1 A. No.</p> <p>2 Q. Did Toledo Clinic, Inc., instruct</p> <p>3 Finance System of Toledo to collect any interest on</p> <p>4 this account?</p> <p>5 A. Not to my knowledge.</p> <p>6 Q. To your knowledge, did Toledo Clinic,</p> <p>7 Inc., instruct Finance System of Toledo to collect any</p> <p>8 attorney fees, court costs, judgment interest,</p> <p>9 miscellaneous fees, or other fees with regards to this</p> <p>10 account?</p> <p>11 A. Not to my knowledge.</p> <p>12 Q. Is there anyone other than you that would</p> <p>13 have knowledge of whether or not Finance System of</p> <p>14 Toledo was instructed to collect those amounts?</p> <p>15 A. No.</p> <p>16 Q. Were you instructed to collect those</p> <p>17 amounts by Toledo Clinic, Inc.?</p> <p>18 A. The 734.16?</p> <p>19 Q. I'm sorry. Yes, other than the 734.16,</p> <p>20 were you instructed by Toledo Clinic, Inc., to collect</p> <p>21 any other amount?</p> <p>22 A. No.</p> <p>23 Q. Okay. And I'll try to make this quick.</p> <p>24 If you could pull out what's been pre-marked as</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 62..65

<p>1 Exhibit H.</p> <p>2 (Deposition Exhibit H was</p> <p>3 presented to the witness.)</p> <p>4 <b>THE WITNESS: Okay.</b></p> <p>5 MR. VOLHEIM: For the record,</p> <p>6 Exhibit H is entitled Defendant Finance</p> <p>7 System of Toledo Produced Account Notes</p> <p>8 for Toledo Clinic, Inc., Reference</p> <p>9 No.28093807001.</p> <p>10 BY MR. VOLHEIM:</p> <p>11 Q. Have you ever seen this document before</p> <p>12 today?</p> <p>13 A. Yes.</p> <p>14 Q. Does this document reflect an account</p> <p>15 that was placed by Toledo Clinic with Finance System</p> <p>16 of Toledo to collect with regards to my client?</p> <p>17 A. Yes.</p> <p>18 Q. What was the date of placement?</p> <p>19 A. 6-18 of '16.</p> <p>20 Q. At the time this account was placed, what</p> <p>21 was the balance?</p> <p>22 A. \$69.13.</p> <p>23 Q. Was this account satisfied?</p> <p>24 A. Yes.</p>	<p>Page 62</p> <p>1 Q. Okay. Do you know who this account was</p> <p>2 satisfied by?</p> <p>3 A. No, I do not.</p> <p>4 Q. It looks like -- am I reading it</p> <p>5 correctly that the account was satisfied on July 27th,</p> <p>6 2017?</p> <p>7 A. I believe it was 8-2 of -- well, yes.</p> <p>8 7-27 of '17, correct.</p> <p>9 Q. Okay. Directing your attention to the</p> <p>10 top of that page, or towards the top of that page, is</p> <p>11 there anything in these account notes that would state</p> <p>12 who made the payment on July 27th, 2017?</p> <p>13 A. No.</p> <p>14 Q. Okay. At the time this account was</p> <p>15 satisfied on July 27th, 2017, what was the balance?</p> <p>16 A. \$69.13.</p> <p>17 Q. Okay. And that was the same balance that</p> <p>18 was put with Finance System of Toledo at placement on</p> <p>19 June 18th, 2017; is that correct?</p> <p>20 A. Say that again. I'm sorry.</p> <p>21 Q. Sure. The balance that was satisfied on</p> <p>22 July 27th, 2017, of \$69.13, is that the same balance</p> <p>23 amount that was placed with Finance System of Toledo</p> <p>24 on June 18th, 2016?</p>
<p>Page 64</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And as we've done on the other</p> <p>3 ones, I just want to go through.</p> <p>4 At the time this account was placed,</p> <p>5 Finance System of Toledo was not seeking collection on</p> <p>6 any interest, attorney fees, court costs,</p> <p>7 miscellaneous fees, or other fees; is that correct?</p> <p>8 A. Correct.</p> <p>9 Q. And at the time -- directing your</p> <p>10 attention back to the Exhibit M, at the time the</p> <p>11 January 15th, 2018, correspondence was sent, did</p> <p>12 Finance System of Toledo have any intent to collect</p> <p>13 any money from my client with regards to this account?</p> <p>14 A. It's a zero balance. No.</p> <p>15 Q. So is -- asking you yes or no, at the</p> <p>16 time the correspondence was sent regarding this</p> <p>17 account, did Finance System of Toledo have any</p> <p>18 intention of collecting any money?</p> <p>19 A. No. On that particular account.</p> <p>20 Q. Okay. Directing your attention to page 1</p> <p>21 of the January 15th, 2018, correspondence, would you</p> <p>22 look at the bottom of that correspondence?</p> <p>23 Right above the -- there is a sentence</p> <p>24 which says, "This is an attempt to collect a debt.</p>	<p>Page 65</p> <p>1 Any information obtained will be used for that</p> <p>2 purpose."</p> <p>3 Do you agree with my reading of that</p> <p>4 statement?</p> <p>5 A. Yes.</p> <p>6 Q. When Finance System of Toledo sent this</p> <p>7 statement dated January 15th, 2018, was it attempting</p> <p>8 to collect a debt from my client?</p> <p>9 A. Yes.</p> <p>10 Q. Finally, directing your attention to --</p> <p>11 I'm going to ask you to take a look at what's been</p> <p>12 pre-marked as Exhibit J, as in "John."</p> <p>13 (Deposition Exhibit J was</p> <p>14 presented to the witness.)</p> <p>15 <b>THE WITNESS: Okay.</b></p> <p>16 MR. VOLHEIM: For the record,</p> <p>17 Exhibit J is Defendant Finance System of</p> <p>18 Toledo Produced Account Notes for Toledo</p> <p>19 Clinic, Inc., reference No. 200095786160</p> <p>20 1954.</p> <p>21 BY MR. VOLHEIM:</p> <p>22 Q. Have you seen this document before today?</p> <p>23 A. Yes.</p> <p>24 Q. Directing your attention to the top of</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 66.69

<p style="text-align: right;">Page 66</p> <p>1 this document, this document -- excuse me.      2 Are these the account notes for a debt      3 placed with Finance System of Toledo by the Toledo      4 Clinic?      5 A. Yes.      6 Q. And the date of the placement was what,      7 please?      8 A. May 10th of 2017.      9 Q. Okay. Directing your attention to the      10 top right-hand corner of that, it says page 9. Are      11 there other pages associated with this account note?      12 A. I don't know.      13 (Pause.)      14 BY MR. VOLHEIM:      15 Q. I just want to make sure you know I'm      16 waiting for you. You can take as much time as you      17 need. I'm just waiting for you.      18 A. Oh.      19 Q. I was worried we were waiting for each      20 other.      21 So is it your testimony that you don't      22 know if there are prior pages?      23 A. Correct.      24 Q. Okay.</p>	<p style="text-align: right;">Page 67</p> <p>1 MR. VOLHEIM: Counsel, we're      2 going to want some clarity as to all of      3 the account notes. I think they all      4 start, or at least most of them start on      5 a page number that is not 1. I'm going      6 to need some clarity regarding this.      7 MR. NOWAK: This is      8 Attorney Nowak. It appears that all the      9 Toledo Clinic accounts, and I'm      10 speculating here, the first page, going      11 through all the notes, starts at 1, and      12 then it seems to move forward. The      13 Allstar seems to be its own set of page      14 numbers. And that's just me paging      15 through the exhibits.      16 MR. VOLHEIM: That doesn't --      17 and I know you're just speculating,      18 James, so I appreciate it.      19 But that doesn't seem to gibe      20 when you look at Exhibit H and Exhibit I      21 in conjunction.      22 MR. NOWAK: Well, it appears      23 that if we look at Exhibit F, it goes      24 from pages 1 through 6, and then Exhibit</p>
<p style="text-align: right;">Page 68</p> <p>1 I.      2 MR. VOLHEIM: Jim, why don't we      3 go off the record to make the court      4 reporter's job easier.      5 MR. NOWAK: Okay.      6 (Discussion had off the record.)      7 BY MR. VOLHEIM:      8 Q. When we went off the record, we were      9 looking at Exhibit J. What was the balance of the --      10 I'm sorry, the date of placement for this account?      11 Was it May 10th, 2017?      12 A. Correct.      13 Q. Okay. What was the balance at that time?      14 A. \$41.14.      15 Q. Okay. And as we've done, just for the      16 last time, at the time the account was placed with      17 Finance System of Toledo there was no interest,      18 attorney fees, court costs, miscellaneous, or other      19 fees being sought.      20 A. Correct.      21 Q. Now, does this account remain      22 outstanding, to your knowledge?      23 A. Yes.      24 Q. Okay. Directing your attention to the</p>	<p style="text-align: right;">Page 69</p> <p>1 bottom of that main page, it looks like there was a      2 payment made on July 27th, 2017, that was reversed; is      3 that correct?      4 A. Correct.      5 Q. Do you have any knowledge as to either      6 why these account notes reflected a payment or why      7 that payment was reversed?      8 A. No, I do not.      9 Q. Okay. But it looks like from these      10 account notes the payment was made and reversed in the      11 same day.      12 A. Correct.      13 Q. Okay. Directing your attention back to      14 Exhibit M, as in Mary, the correspondence from January      15 15th, 2018, looking at the bottom of the page, the      16 account that we were just looking at in Exhibit J, is      17 that the account that's reflected at the bottom -- at      18 the bottom of the page there?      19 A. Correct.      20 Q. Okay. And at the time that this      21 correspondence was sent, no payment had been made on      22 this account; is that correct?      23 A. Correct.      24 Q. Okay. At the time that this</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 70..73

<p>1 correspondence was sent, did Finance System of Toledo 2 have any intent to add interest to this account? 3       A. Not at this time. It's again ... 4       Q. Okay. At the time that this 5 correspondence was sent, did Finance System of Toledo 6 have any intent to add any other fees? 7       A. No. 8       Q. And I belief with regards to interest, 9 you stated that not at this time did Finance System of 10 Toledo have any intention of adding any interest; is 11 that correct? 12       A. This is a snapshot of the account at that 13 time. 14       Q. Since this time, has Finance System of 15 Toledo added any interest, attorney fees, court costs, 16 miscellaneous fees, have they added anything to the 17 balance of this account? 18       A. No. 19       Q. And for clarity, is there any written 20 correspondence or document which governs how the 21 Toledo Clinic, Inc., wanted Finance System of Toledo 22 to collect this account? 23       A. No. 24       Q. Did the Toledo Clinic instruct at any</p>	<p>Page 70 1 point Finance System of Toledo to collect interest on 2 this account? 3       A. I don't know. 4       Q. Would anyone else know -- 5       A. No. 6       Q. Other than yourself -- I'm sorry, I 7 didn't mean to cut you off. 8       A. No. That's okay. No. 9       Q. Okay. To your knowledge, were you ever 10 directed by the Toledo Clinic, Inc., to collect 11 interest with regards to this account? 12       A. Not to my knowledge, no. 13       Q. Okay. Were you instructed by the Toledo 14 Clinic, Inc., to collect anything other than the 15 balance of 41.14 on this account? 16       A. At the time of placement and -- 41.14. 17       Q. And through -- from the time of placement 18 through when we currently sit here today, have you 19 been instructed by Finance System -- excuse me. 20 Strike that. Sorry. 21                  From the time of placement to right now, 22 as you sit here today, have you been instructed by the 23 Toledo Clinic to collect any amounts other than 41.14 24 with regards to this account?</p>
<p>1       A. No. 2                  MR. VOLHEIM: Okay. If we can 3 go on break for about five minutes, that 4 may be all I have, but let me review my 5 notes, and we'll come back. 6                  Actually, if you guys just want 7 to wait around, it probably will only 8 take me a couple minutes. 9                  THE WITNESS: Okay. 10                 (Pause.) 11                  MR. VOLHEIM: There is one more 12 exhibit that I want to go through. I'm 13 going to ask -- and you don't need to go 14 through this line by line. 15                  I'm going to ask the court 16 reporter to hand you what's been 17 pre-marked Exhibit C, as in "cat." 18                  (Deposition Exhibit C was 19 presented to the witness.) 20                  MR. VOLHEIM: Okay. For the 21 record, Exhibit C is Finance System of 22 Toledo Responses to Plaintiff's First Set 23 of Discovery Requests. 24 BY MR. VOLHEIM:</p>	<p>Page 72 1       Q. Have you seen this document before today? 2       A. Yes. 3       Q. Did you participate in the answers that 4 are contained in this document? 5       A. Yes. 6       Q. Please direct your attention to No. 5 on 7 page 2. 8       A. Uh-huh. 9       Q. Let me know when you're there. 10      A. Oh, I'm there. 11      Q. I'm sorry. This is a request to admit. 12     In it Finance System of Toledo was asked to admit that 13 the collection letters you sent to plaintiff are form 14 letters. 15     Finance System of Toledo's answer was, 16 "Admitted." 17     As you sit here today, is there anything 18 that you would change about that answer? 19      A. No. 20      Q. Okay. Directing your attention to -- 21 there are some numbers at the bottom of the document. 22 I'm going to ask you to flip to page 6. 23      A. Okay. 24      Q. I'm specifically going to direct your</p>

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 74..77

<p>1 attention to No. 9. 2 In the response to No. 9, in part, 3 Finance System of Toledo stated, "Defendant does not 4 have copies of the actual written correspondence it 5 sent to Plaintiff." 6 To the best of your knowledge, is that 7 answer still correct? 8 A. Yes. 9 Q. So Finance System of Toledo does not 10 retain a copy of the specific correspondence that it 11 sends to an individual consumer; is that correct? 12 A. Correct. 13 Q. Does Finance System of Toledo have in its 14 possession a copy of the January 15th, 2018, 15 correspondence? 16 A. Yes, now. 17 Q. Okay. Is that the copy that was provided 18 by my client? 19 A. Correct, yes. 20 Q. Okay. Other than what was provided by my 21 client, does Finance System of Toledo have a copy of 22 the correspondence dated January 15th, 2018? 23 A. No. 24 Q. Okay. To your knowledge, does Renkim</p>	<p>Page 74</p> <p>1 Corporation -- and Ms. Court Reporter, that's spelled 2 R-e-n-k-i-m. 3 To your knowledge, does Renkim have a 4 copy of the correspondence dated January 15th, 2018? 5 A. I would have no idea. 6 Q. Did Finance System of Toledo ask Renkim 7 if they had a copy of this correspondence? 8 A. No. 9 Q. If Renkim had a copy of this 10 correspondence, would Finance System of Toledo be 11 entitled to that? 12 A. I would assume so. 13 Q. Do you have any reason to doubt that the 14 January 15, 2018, correspondence in front of you, 15 pages 1 and 2, are not a true -- excuse me. Strike 16 that. 17 With regards to Exhibit M and the 18 correspondence from January 15th, 2018, do you believe 19 this is a true and accurate and complete copy of that 20 correspondence? 21 A. It appears so, yes. 22 Q. Do you have any reason to believe that 23 this correspondence has been altered in any way? 24 A. No.</p>
<p>1 MR. VOLHEIM: Okay. That is all 2 the questions I have subject to whatever 3 your counsel may ask you. I sincerely 4 appreciate your time here this morning 5 and afternoon. 6 MR. GENTRY: Nathan, this is 7 Boyd. If you will give Jim and I a 8 couple minutes, I would like to consult 9 with him to see if we will ask any 10 questions on the record. 11 MR. VOLHEIM: Okay. 12 MR. GENTRY: All right. Thanks. 13 (Discussion had off the record.) 14 MR. NOWAK: I think the speaker 15 is open. I think we're back on the 16 record. 17 MR. VOLHEIM: This is Nate. I'm 18 here. 19 MR. NOWAK: Boyd, are you there? 20 MR. GENTRY: Boyd Gentry. 21 MR. NOWAK: Okay. 22 MR. GENTRY: Nathan, we're back. 23 I'm back. Are you there, Nathan? 24 MR. VOLHEIM: I'm here.</p>	<p>Page 76</p> <p>1 MR. GENTRY: Okay. We have no 2 further questions. We will not be 3 questioning the witness. 4 I would like to go on the record 5 and have the court reporter state the 6 exhibits you have and that you'll keep 7 custody of. 8 (Discussion had off the record.) 9 MR. GENTRY: This is 10 Boyd Gentry, counsel for defendant. The 11 exhibits that were used in the deposition 12 included A, B, C, F, G, H, I, J, L, and 13 M, as in "Mary," and I believe that is 14 all the exhibits. We would ask that the 15 court reporter hang on to the originals 16 there, and if anyone needs them, we can 17 order them from the court reporter. 18 MR. VOLHEIM: This is Nathan 19 Volheim for the plaintiff. 20 And Boyd, for the record, you do 21 not have any further questions of the 22 witness? 23 MR. GENTRY: Correct. We have 24 no questions.</p>

**ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO**  
Nancy Quiroga October 22, 2019

Job 31004  
Pages 78..81

	Page 78	Page 79
1	We will reserve signature.	SIGNATURE PAGE
2	THE COURT REPORTER: Mr.	Date of Deposition: October 22, 2019
3	Volheim, would you like to order the	Correction page(s) enclosed? Yes <input type="checkbox"/> No <input type="checkbox"/>
4	transcript?	How many correction pages? _____
5	MR. VOLHEIM: Yes. Regarding	
6	the order, it would be electronic only,	
7	and we do not need the exhibits.	
8	THE COURT REPORTER: Mr. Gentry	NANCY QUIROGA Date
9	or Mr. Nowak, would you like a copy of	---
10	the transcript?	
11	MR. GENTRY: I believe we will.	
12	You can send it to Jim's office.	
13	THE COURT REPORTER: Would you	
14	like scanned copies of exhibits?	
15	MR. NOWAK: No.	
16	MR. VOLHEIM: Do we need to do	
17	anything else, counsel?	
18	MR. GENTRY: I don't think so.	
19	I do not believe we do.	
20	(Deposition concluded and	
21	witness excused at 1:30 p.m.)	
22	(Signature reserved.)	
23	---	
24		
	Page 80	Page 81
1	C E R T I F I C A T E	
2		
3	I, Casey G. Schreiner, a Notary Public in and	IN WITNESS WHEREOF, I have hereunto set
4	for the State of Ohio, duly commissioned and	my hand and affixed my seal of office at Toledo, Ohio
5	qualified, do hereby certify that the within-named	on this 11th day of November, 2019.
6	witness was by me first duly sworn to tell the truth,	<i>Casey G. Schreiner</i>
7	the whole truth, and nothing but the truth in the	
8	cause aforesaid; that the testimony then given was by	CASEY G. SCHREINER, RMR-RDR
9	me reduced to stenotype in the presence of said	Notary Public
10	witness and afterwards transcribed; that the foregoing	in and for the State of Ohio
11	is a true and correct transcription of the testimony	
12	so given as aforesaid.	
13	I do further certify that this deposition was	My Commission expires December 26, 2021.
14	taken at the time and place in the foregoing caption	
15	specified.	
16	I do further certify that I am not a	
17	relative, employee of or attorney for any of the	
18	parties in this action; that I am not a relative or	
19	employee of an attorney of any of the parties in this	
20	action; that I am not financially interested in this	
21	action, nor am I or the court reporting firm with	
22	which I am affiliated under a contract as defined in	
23	the applicable civil rule.	
24		

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Index: \$41.14..account

Exhibits		
<b>Exhibit A</b> 12:5,10,13	<b>15th</b> 18:2,24 30:17 31:6,12 33:11 36:11 41:6,13 42:6 43:3 44:2,18 45:4, 7 46:5,18,24 49:24 50:22 52:12 57:1, 12,16 59:3,13 64:11,21 65:7 69:15 74:14,22 75:4,18	<b>5-18</b> 47:22  <b>6</b>
<b>Exhibit B</b> 13:19,20,21 14:7 17:11	<b>16</b> 54:21 62:19	<b>6</b> 67:24 73:22
<b>Exhibit C</b> 72:17,18,21	<b>17</b> 28:10 29:21 47:24 56:7 63:8	<b>6-18</b> 62:19
<b>Exhibit F</b> 24:7,9,11,15,19,22,24 25:4 67:23	<b>18</b> 5:21	<b>66</b> 30:13 <b>66.37</b> 25:16 26:11,24 27:17
<b>Exhibit G</b> 47:4,7,11,15,17	<b>18th</b> 63:19,24	<b>6th</b> 54:21
<b>Exhibit H</b> 62:1,2,6 67:20	<b>1954</b> 65:20	
<b>Exhibit I</b> 53:3,4 54:4,12 67:20,24 68:1	<b>1:30</b> 78:21	<b>7</b>
<b>Exhibit J</b> 65:12,13,17 68:9 69:16		<b>7-23</b> 25:5 27:24
<b>Exhibit L</b> 36:17,18,22,24 37:2,4 38:7, 8,22 39:6,14,18,23 41:4	<b>2</b> 12:21 73:7 75:15 <b>20</b> 9:17 10:10,11,12 28:5 <b>200095786160</b> 65:19	<b>7-27</b> 47:24 63:8 <b>734.16</b> 57:3,11 61:18,19
<b>\$</b>		<b>8</b>
<b>\$41.14</b> 68:14	<b>2013</b> 25:7	
<b>\$66.37</b> 26:19	<b>2016</b> 63:24	<b>8-2</b> 63:7
<b>\$69.13</b> 62:22 63:16,22	<b>2017</b> 29:19 31:4 33:2 48:18,21 63:6, 12,15,19,22 66:8 68:11 69:2	<b>9</b>
<b>\$734.16</b> 55:5 57:14	<b>2018</b> 18:2,24 30:9,11,18 31:6,12 33:11 36:12 41:6,14 42:7 43:4 44:3,18 45:4,7 46:5,18,24 49:24 50:4,12,22 52:12 57:1,12,16 59:3,13 64:11,21 65:7 69:15 74:14,22 75:4,14,18	
<b>\$768.93</b> 54:24	<b>22</b> 10:9 <b>23</b> 12:23 13:5,10,13	<b>A</b>
<b>0</b>	<b>23rd</b> 25:6 <b>24th</b> 29:19 31:4 33:2	
<b>001</b> 60:4	<b>27962730001</b> 54:14 60:6	<b>ability</b> 50:5,9
<b>02652</b> 5:22	<b>27th</b> 48:18,21 63:5,12,15,22 69:2	<b>able</b> 13:9,13
<b>1</b>		<b>about</b> 10:9 14:2 20:13 21:13,14,22,23 26:18 37:23 38:12,24 40:11 44:22 53:13,21 56:5 72:3 73:18
<b>1</b> 12:23 13:4,9,13 64:20 67:5,11,24 75:15		<b>above</b> 64:23
<b>10</b> 53:10		<b>ACA</b> 20:6
<b>10-24</b> 28:10 29:21 56:7		<b>account</b> 19:11 21:12,15,18 24:2,16 25:2,5,11,13,14,15,18,22 26:1,4,7,10, 11 27:9,10,14,16,20 28:1,13,15,18,20 29:11,12,15,16,19 30:3,11,14 31:1,3, 10 32:2 33:1,3,10,11 34:15 35:1,15 36:23 37:6,8,9,12 39:22 40:8,10,14, 16,20,23 41:2,12 42:9 47:19,20,23 48:2,6,15,17,20 49:3,4,8,21 50:2,14 51:2,4,6,10,22 52:3 54:16 55:2,24 56:3,13,23 57:1,11,19 60:3,5,9,16 61:4,10 62:7,14,20,23 63:1,5,11,14 64:4,13,17,19 65:18 66:2,11 67:3 68:10,16,21 69:6,10,16,17,22 70:2,12,
<b>10-24-17</b> 55:14		
<b>10-24-2017</b> 56:5		
<b>10th</b> 66:8 68:11		
<b>12:35</b> 53:13		
<b>13</b> 25:5 27:24	<b>41.14</b> 71:15,16,23	
<b>15</b> 47:22 50:4,12 75:14		
<b>157</b> 48:3		
	<b>5</b>	
	<b>5</b> 53:10 73:6	

**ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO**  
**Nancy Quiroga October 22, 2019**

Job 31004  
Index: account's..back

17,22 71:2,11,15,24	alleged 17:14	75:21
<b>account's</b> 31:24	<b>Allstar</b> 33:12,13,17,18,22 34:2 35:19 40:20 42:4 47:13,18 49:9,14,20 50:1, 14 51:1,21 52:8 67:13	<b>apple</b> 12:6
<b>accounts</b> 19:6,7 21:12 28:23 31:15, 18 32:21 33:6,7,14 34:5,16 35:4,8,9, 12,19,23 36:2,7,11,13,23 37:10,12,16, 18 38:9,23 39:3,4,14,21 40:2,7 41:15, 23 42:2,5,12 47:12 54:13 56:12 67:9	<b>Allstar's</b> 40:23	<b>appreciate</b> 16:4 67:18 76:4
<b>accurate</b> 29:4 31:7 42:8 75:19	<b>already</b> 42:21	<b>approximately</b> 10:12 12:18 43:17 49:2
<b>accurately</b> 13:9	<b>also</b> 6:9	<b>are</b> 7:11 8:3,24 9:3,6 10:18,23 11:15, 21 13:8 14:13 15:5,15 17:6,19,23 20:3,4 22:1,4,24 29:7 32:17,21 33:6,7 34:5 38:8,10,23 39:4,10,11,15,21 40: 41:15,16,22 42:2,12 46:8 52:6 53:23 66:2,10,22 73:4,13,21 75:15 76:19,23
<b>achieved</b> 11:8	<b>always</b> 22:12	<b>argue</b> 17:1
<b>Act</b> 19:16 45:24	<b>amazing</b> 7:7	<b>around</b> 72:7
<b>activity</b> 25:10	<b>amended</b> 12:14 15:16	<b>aside</b> 13:16 17:11 19:4,5
<b>actual</b> 39:24 74:4	<b>amount</b> 25:16 26:9,17,24 27:1,4,8,10, 13,17 51:10 52:17 57:13 61:21 63:23	<b>ask</b> 7:2 8:2,10 12:4 13:17,18 14:10,19 18:7 21:3 24:5 29:11 36:16 38:18 47:3 53:2 65:11 72:13,15 73:22 75:6 76:3,9 77:14
<b>actually</b> 12:22 13:18 30:22 60:4 72:6	<b>amounts</b> 61:14,17 71:23	<b>asked</b> 8:9 29:15 42:14 52:20 73:12
<b>add</b> 50:5 57:18,22 70:2,6	<b>Amy</b> 6:14 44:11	<b>asking</b> 11:19 14:1 17:12 18:23 46:8 54:3 64:15
<b>added</b> 26:9,17 27:11,13,17 48:23 49:5 50:1 56:20 57:4,13 59:22 70:15, 16	<b>answer</b> 7:3,18 8:13,14,19,20 10:23 14:8 15:16 26:13 39:18 42:17 51:14, 19 52:24 58:2,5 59:9 73:15,18 74:7	<b>assigned</b> 25:5,16,17,18,21,24 26:4,6, 24 27:24 48:2 55:7
<b>adding</b> 50:13,24 70:10	<b>answered</b> 42:15 52:21	<b>assist</b> 44:17
<b>additional</b> 14:14 57:13 58:20	<b>answering</b> 8:4	<b>associated</b> 25:3 40:15 66:11
<b>adjourn</b> 16:11,12	<b>answers</b> 7:9,14 9:3 73:3	<b>assume</b> 6:21 75:12
<b>administrative</b> 10:22	<b>anticipate</b> 7:21 14:1 15:8 16:5,6	<b>attempt</b> 64:24
<b>admit</b> 73:11,12	<b>anticipated</b> 15:20	<b>attempting</b> 65:7
<b>Admitted</b> 73:16	<b>any</b> 5:16 7:22 8:24 9:7,20 10:5,14,15 11:10,20 13:7 16:12 17:13 19:21 20:7, 8 22:2,4 23:24 26:9,10,17 27:8,10,13, 17 28:2 31:10 33:14,19,23 34:3,14 35:1 36:5,12 38:9 39:4,14 42:10,12,20 44:16,22,23 45:3,13,15,23 48:21 49:17 50:1,6,12,13,14,23 51:10 52:16 53:19 56:19 57:13,18,22 60:11,15,18, 21 61:3,7,21 64:6,12,13,17,18 65:1 69:5 70:2,6,10,15,19,24 71:23 75:13, 22,23 76:9 77:21	<b>attention</b> 14:15 23:8 24:6 38:23 41:13 56:2,22 63:9 64:10,20 65:10,24 66:9 68:24 69:13 73:6,20 74:1
<b>advanced</b> 45:23	<b>anybody</b> 53:20	<b>attorney</b> 11:16 14:19 25:21 44:17,24 45:2,6,10,20 48:11 52:17 56:14 61:8 64:6 67:8 68:18 70:15
<b>affirmative</b> 14:22,23 15:18 39:9	<b>anyone</b> 6:16 7:23 46:2,19 61:12 71:4 77:16	<b>attorney's</b> 48:21
<b>afraid</b> 12:2	<b>anything</b> 13:11 20:19 29:14 48:23 51:21 56:8 58:23,24 59:2,21 63:11 70:16 71:14 73:17 78:17	<b>attorneys'</b> 10:21
<b>after</b> 12:7 29:22 33:3	<b>apologize</b> 5:15 20:14 45:19 48:16	<b>avoid</b> 15:13
<b>afternoon</b> 76:5	<b>appearing</b> 6:5,6,20	<b>aware</b> 55:19
<b>again</b> 7:10,17 8:23 13:17 23:10 32:17 34:18 45:19 52:14 57:24 63:20 70:3	<b>appears</b> 18:24 25:1 41:19 67:8,22	<hr/> <b>B</b> <hr/>
<b>against</b> 17:1 23:14 25:10 51:2		
<b>agree</b> 19:15 39:1 41:14 53:15 58:9 65:3		
<b>agreed</b> 8:5		
<b>agreeing</b> 58:5		
<b>agreement</b> 22:9,14,16,19,24 23:3,5, 17,18,20 49:13 60:7,11,15,18		
<b>ahead</b> 8:3,14,19 19:5 21:1 26:13 30:20 38:15 42:18 52:1 54:5 58:13 59:6,8,17		

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004

Index: background..consecutive

<b>background</b> 11:6 19:18 20:22 30:7	<b>bunch</b> 6:3	12 37:14 38:10 39:5 40:20,23 41:3,5 47:12 51:2 52:2,18 54:18 55:20 60:5 62:16 64:13 65:8 74:18,21
<b>balance</b> 25:15 26:9 27:6,11,13,17 28:3,4,13,19 29:22 34:15 35:2 48:1,23 49:6 52:17 54:22 55:2,4,6 56:18,20 57:2 58:17 62:21 63:15,17,21,22 64:14 68:9,13 70:17 71:15	<b>C</b>	<b>client's</b> 40:15 <b>clients</b> 10:24 11:1,2,3,4 21:21 41:3 <b>Clinic</b> 33:20 35:24 40:24 42:4 54:14, 17 60:8,23 61:2,6,17,20 62:8,15 65:19 66:4 67:9 70:21,24 71:10,14,23
<b>based</b> 11:22 31:9 33:18,22	<b>called</b> 5:2	<b>closed</b> 28:15,18 31:1
<b>bat</b> 5:15	<b>can</b> 5:7,10 6:5,12,21 8:13,18 9:11 10:17 12:3,6 13:15 14:24 15:19,21 17:11 18:3,14 19:14 20:17 21:10 22:21 23:9 27:17 34:18,20 39:17 42:17 46:11 50:20 51:14,19 52:23 53:6 55:17 66:16 72:2 77:16 78:12	<b>collect</b> 22:8 23:14 24:2 49:10,20 51:10 52:6 54:17 57:8 60:24 61:3,7, 14,16,20 62:16 64:12,24 65:8 70:22 71:1,10,14,23
<b>because</b> 6:19 7:10,11 8:9 15:2,13 16:14 28:20 31:7 34:5,16 35:2 39:21 42:8	<b>can't</b> 6:6 12:20 35:17 43:15	<b>collected</b> 22:15 23:4,22 <b>collecting</b> 21:14,23 50:24 51:21 52:16 64:18
<b>been</b> 10:9,12 12:5,13 13:19 15:5 18:8 24:6,15 29:5 36:16 37:23 38:11,24 41:23 43:12,17 44:11 47:4 48:23 49:5 53:3 54:3 56:20 57:13 61:24 65:11 69:21 71:19,22 72:16 75:23	<b>cannot</b> 7:1 27:12	<b>collection</b> 17:20,24 19:16 25:10 45:24 49:15 60:9,16 64:5 73:13
<b>before</b> 5:24 8:4 12:16 21:4 24:19 36:24 46:9,15 47:15 54:9 62:11 65:22 73:1	<b>case</b> 5:21 16:18 17:5	<b>collections</b> 10:2
<b>beginning</b> 17:6	<b>cat</b> 72:17	<b>collector</b> 34:11,16 35:3,7,11
<b>behalf</b> 23:14	<b>category</b> 57:7 59:23	<b>collectors</b> 35:15
<b>being</b> 7:11 31:18 45:7 46:5,20 47:1 55:11 68:19	<b>certain</b> 12:20 27:12	<b>college</b> 11:9,11
<b>belief</b> 70:8	<b>certainly</b> 15:21 16:22	<b>column</b> 58:18,21
<b>believe</b> 13:15 15:13 32:18 39:8 56:3 59:9 63:7 75:18,22 77:13 78:11,19	<b>certification</b> 45:15,23	<b>columns</b> 17:17,19
<b>benefit</b> 5:10 43:21	<b>certifications</b> 20:8	<b>Combined</b> 10:10
<b>best</b> 74:6	<b>certified</b> 5:4	<b>come</b> 19:4 72:5
<b>between</b> 10:20 22:9 23:18,20 24:1 49:13 60:7	<b>chance</b> 12:8 18:13 24:9	<b>comes</b> 45:23
<b>bit</b> 6:21 44:20	<b>change</b> 73:18	<b>comfortable</b> 16:8
<b>body</b> 7:12	<b>changed</b> 16:20	<b>coming</b> 9:17
<b>bona</b> 14:23 16:13 17:7	<b>changes</b> 16:18	<b>communication</b> 49:17
<b>both</b> 38:22	<b>charges</b> 50:13 57:22	<b>communications</b> 44:16
<b>bottom</b> 64:22 69:1,15,17,18 73:21	<b>circumstance</b> 21:18	<b>Complaint</b> 14:8
<b>boy</b> 13:20	<b>circumstances</b> 21:21 22:1	<b>complete</b> 75:19
<b>Boyd</b> 8:18 14:20 20:11 22:18 26:15 30:1,15 42:23 76:7,19,20 77:10,20	<b>civil</b> 5:22	<b>comprised</b> 27:5 59:14
<b>break</b> 7:24 8:5 37:23 53:7,18,19 72:3	<b>claim</b> 15:3,4,6,14 16:21 30:4	<b>concluded</b> 78:20
<b>breaks</b> 7:24	<b>clarify</b> 22:18,22	<b>conference</b> 20:12
<b>brief</b> 53:16	<b>clarifying</b> 10:11	<b>confusing</b> 60:20
<b>broad</b> 42:20	<b>clarity</b> 26:14 37:7 48:17 56:12 58:4 67:2,6 70:19	<b>Congratulations</b> 9:18
	<b>class</b> 20:7	<b>conjunction</b> 67:21
	<b>clean</b> 26:22	<b>consecutive</b> 10:12
	<b>clear</b> 15:23 44:21 58:7,10	
	<b>clearly</b> 6:22	
	<b>client</b> 5:19 9:13 10:20 14:21 17:14,21 18:1,21 19:8 21:6,19 23:4,12,15 24:17 25:10 28:6 29:8,10,15,18 31:10 36:10,	

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
 Nancy Quiroga October 22, 2019

Job 31004

Index: constraints..documents

<b>constraints</b> 48:10	<b>court</b> 5:10 6:12,16 11:24 12:4 13:18 15:5,17 17:5 18:7 20:16 21:3 24:8 25:24 34:19,22 48:11,22 56:14 61:8 64:6 68:3,18 70:15 72:15 75:1 77:5, 15,17 78:2,8,13	<b>deposition</b> 5:24 7:21,23 8:8 12:10,14 13:21 16:11,24 17:2 18:10 24:11 36:18 47:7 53:4 62:2 65:13 72:18 77:11 78:20
<b>consult</b> 76:8	<b>cover</b> 12:22 49:15 60:16	<b>derived</b> 26:19
<b>consumer</b> 29:3,4,7 59:12 74:11	<b>create</b> 46:8	<b>description</b> 42:9
<b>consumers</b> 31:8	<b>created</b> 44:1	<b>designated</b> 13:3
<b>contact</b> 21:7	<b>creditors</b> 42:3	<b>designed</b> 15:12
<b>contain</b> 39:14	<b>current</b> 9:12,21,24 10:18 57:13	<b>details</b> 27:7
<b>contained</b> 73:4	<b>currently</b> 55:1 56:18 71:18	<b>determine</b> 31:15
<b>contents</b> 44:16	<b>custody</b> 77:7	<b>dialed</b> 20:13
<b>contingency</b> 26:6 48:12,22 56:16	<b>cut</b> 20:12 59:7 71:7	<b>did</b> 8:10 9:24 10:3 11:10 17:14 23:13 25:9 29:10,17 35:7,18,22 36:2,10,12 37:2 41:5 44:17 45:2,6 46:18 49:9 50:5,12,19,23 52:15 53:20 57:17,21 59:6 61:2,6 64:11,17 70:1,5,9,24 73:3 75:6
<b>continue</b> 32:1 33:4		<b>didn't</b> 71:7
<b>contraction</b> 39:12	<b>D</b>	<b>different</b> 7:18 19:6 21:20,21 39:22 40:20,23 41:15,23 42:3
<b>conversation</b> 53:20	<b>date</b> 27:24 48:2,15 54:20 56:12 62:18 66:6 68:10	<b>difficult</b> 6:21
<b>conversations</b> 44:22	<b>dated</b> 18:1 41:6 43:3 44:2 59:13 65:7 74:22 75:4	<b>diploma</b> 11:13
<b>copies</b> 74:4 78:14	<b>day</b> 69:11	<b>direct</b> 8:18 14:15 21:7,13 23:8 24:6 41:13 49:9 56:2 73:6,24
<b>copy</b> 18:3 74:10,14,17,21 75:4,7,9,19 78:9	<b>debt</b> 19:16 21:23 22:8,15 23:4,14,22 25:3,10 32:19 33:15 45:24 48:24 49:15 52:8 60:24 64:24 65:8 66:2	<b>directed</b> 60:20 71:10
<b>corner</b> 66:10	<b>debts</b> 36:10 52:6	<b>directing</b> 38:22 56:22 63:9 64:9,20 65:10,24 66:9 68:24 69:13 73:20
<b>corporate</b> 13:4	<b>decide</b> 35:7	<b>direction</b> 43:21 49:17
<b>Corporation</b> 75:1	<b>decided</b> 34:16 35:3 44:2,5	<b>discovery</b> 17:3 72:23
<b>correct</b> 9:9,10 11:5,16,17 22:13 25:8 27:2,3 29:1,20,24 32:19 39:2 42:3 43:6 48:14 49:7 51:7 52:9,10,13 53:24 55:8,9 56:16,17 57:10 59:10,11 63:8, 19 64:7,8 66:23 68:12,20 69:3,4,12, 19,22,23 70:11 74:7,11,12,19 77:23	<b>decision</b> 34:9 35:16 44:7,10	<b>discuss</b> 15:19,21
<b>correctly</b> 63:5	<b>defendant</b> 16:5 24:16 36:22 47:11 54:12 62:6 65:17 74:3 77:10	<b>discussion</b> 68:6 76:13 77:8
<b>correspondence</b> 17:20,24 18:20 19:1 23:24 31:5 32:1 33:4 36:12 41:6, 14,16,22 42:7,11 44:19 45:4,7 46:5 49:24 50:5,12,23 52:12,15 57:17,23 59:3,22 60:1,19,21 64:11,16,21,22 69:14,21 70:1,5,20 74:4,10,15,22 75:4,7,10,14,18,20,23	<b>Defendant's</b> 14:7	<b>dismissed</b> 15:5
<b>costs</b> 25:24 48:22 56:15 61:8 64:6 68:18 70:15	<b>defense</b> 14:14,18,23 15:8,18	<b>Disposal</b> 33:12,13,17,19,23 34:2 35:20 40:20 47:13,19 49:9,14,20 50:2, 14 51:1,21 52:8
<b>could</b> 19:3,5,9 24:8 38:18 54:5 58:23, 24 59:22 61:24	<b>defenses</b> 14:14	<b>disrespectful</b> 7:19
<b>counsel</b> 5:17 6:8,9,11,16 8:8,12,13 13:8 30:22 67:1 76:3 77:10 78:17	<b>defines</b> 59:3	<b>District</b> 5:21
<b>Counterclaims</b> 14:8	<b>definite</b> 43:15	<b>document</b> 12:7,16,19,21 23:9 40:3 54:5,8 62:11,14 65:22 66:1 70:20 73:1,4,21
<b>couple</b> 6:3 7:20 56:4 72:8 76:8	<b>definitely</b> 19:4	<b>documentation</b> 22:2,5
<b>course</b> 18:4 46:7 50:21 53:8	<b>definitive</b> 16:7	<b>documents</b> 20:2,4
	<b>degree</b> 11:10	
	<b>depend</b> 21:16,17 32:16	
	<b>depends</b> 31:17 32:3,4,5,12	
	<b>deposed</b> 5:4	

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Index: dollar..gibe

**dollar** 28:5 30:13

**dollars** 48:3,10

**doubt** 75:13

**down** 33:10

**dropped** 20:12

**due** 58:17

**duly** 5:3

**during** 7:22 10:15 53:18

**duties** 10:18

---

## E

---

**easier** 68:4

**education** 11:7

**either** 8:9,19 9:7 16:1 36:6 69:5

**electronic** 78:6

**else** 6:8,13,17 46:14 58:23,24 71:4  
78:17

**ending** 60:3

**engage** 23:13 25:10

**entail** 20:1

**entails** 59:4

**entirely** 8:10

**entities** 21:7 34:4

**entitled** 7:24 62:6 75:11

**entity** 21:11

**entries** 56:4,6,8

**EPNO** 23:12,13,18,21 24:1,17 27:6  
28:6 32:23 33:23 36:3 40:19,22 42:4

**ER** 24:17

**error** 14:23 15:6,9,10,13,14 16:14  
17:7

**established** 56:11

**ever** 5:23 29:10 31:10 62:11 71:9

**evidence** 15:12

**exactly** 35:17

**Examination** 5:3,5

**example** 32:21 33:5

**examples** 21:10

**exclusive** 43:17

**excuse** 23:1,18 30:16,23 31:1 38:11  
44:1 45:13 49:18 50:24 51:5 55:20  
66:1 71:19 75:15

**excused** 78:21

**exhibit** 12:5,10,13 13:19,21 14:7  
17:11 18:5,9,10,14,20 23:9 24:2,7,9,  
11,15,19,22,24 25:4 30:5 36:17,18,22,  
24 37:2,4 38:7,8,11,22,23 39:6,14,15,  
18,23 41:4,14,22 47:4,7,11,15,17  
53:3,4 54:4,12 56:23 62:1,2,6 64:10  
65:12,13,17 67:20,23,24 68:9 69:14,  
16 72:12,17,18,21 75:17

**exhibits** 12:1,2 67:15 77:6,11,14  
78:7,14

---

## F

---

**fair** 7:5 10:8 16:17 19:15 21:20 31:10  
45:24 48:9,10

**faith** 15:9

**fall** 40:1

**familiarity** 19:19

**FDCPA** 19:14,15,19,22 20:2,4,8,24  
45:16

**feel** 18:15

**fees** 25:21 26:3,6 48:11,12,21,22  
50:1,6 51:1 52:17 56:14,15,16,19  
61:8,9 64:6,7 68:18,19 70:6,15,16

**few-minute** 53:7

**fide** 14:23 16:13 17:7

**file** 15:16

**filed** 5:20 11:23 16:3

**final** 29:21

**Finally** 65:10

**Finance** 5:20 9:14,21 10:1,6,9,24  
13:3 14:18 17:14,20 18:1,21 19:7  
21:8,12,13,14,22 22:8,9 23:1,13,21  
24:1 25:4,9,14 26:10 27:1,9,20,21  
28:7,9,12,22 29:11,16 31:5,11,14,24  
33:3 34:12 35:18,22 36:2,5,13,22  
37:13 38:9 39:5 40:6 42:11 43:7,9,13,  
18,21 44:1,5,23 47:11,21 48:7,13  
49:4,9,14,19,23 50:11,22,23 51:9,20  
52:5,15 54:12,17,23 55:7,17 56:13  
57:8,17,21 60:7,19,22 61:3,7,13 62:6,

15 63:18,23 64:5,12,17 65:6,17 66:3  
68:17 70:1,5,9,14,21 71:1,19 72:21  
73:12,15 74:3,9,13,21 75:6,10

**fine** 7:24 20:21 59:8

**finish** 8:4

**first** 5:3 6:3 12:18 18:15 24:21 37:2  
54:23 67:10 72:22

**five** 38:23 39:3 43:14 72:3

**five-year** 43:16

**flip** 12:21 14:10 56:7 73:22

**flipped** 13:24

**follow-up** 16:24

**following** 34:23

**follows** 5:4

**form** 41:19 51:24 73:13

**formally** 16:15

**formulate** 32:13

**forth** 15:8,12

**forward** 51:11 67:12

**frame** 37:19

**free** 18:15

**front** 75:14

**FST** 24:16

**full** 5:7 28:19,20 29:19 31:3 33:3  
41:13,17,23 42:6 51:4,6 52:3,6,9,11

**fully** 13:9

**further** 17:2 51:21,24 52:16 77:2,21

---

## G

---

**Gaston** 5:20 11:22 29:8,10

**general** 10:17 19:20 29:7,9

**generally** 11:19 21:11 46:11

**generated** 43:7

**Gentry** 8:17 15:2,19 16:16 20:10,11,  
18 21:1 22:17 26:12,16 30:1,8,13,19  
32:7,11 37:22 38:3,13 39:8 40:9 41:18  
42:14,18,21 50:8,15 51:12,23 52:20  
58:12 59:16 60:10 76:6,12,20,22 77:1,  
9,10,23 78:8,11,18

**glbe** 67:19

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Index: girl..lawsuit

girl 47:4,6	His 29:21	issue 30:3
give 7:3 42:12 43:15 76:7	history 42:9	issues 13:12
given 5:23	hold 9:24 20:8	
giving 42:8	holds 37:9,10	
good 5:7,13,14 11:18 15:9	honest 22:6	
governs 70:20	Honestly 12:20	J
grab 23:9	hospital 10:21 22:7 24:17	James 46:16 67:18
great 6:24 7:16 8:7,16 9:15 12:12 19:3 53:12 54:8	hour 37:24	January 18:1,24 30:9,11,17 31:6,12 33:11 36:11 41:6,13 42:6 43:3 44:2,18 45:3,7 46:4,18,24 49:24 50:4,12,22 52:12 57:1,12,16 59:3,13 64:11,21 65:7 69:14 74:14,22 75:4,14,18
ground 6:4 20:19	hours 7:21	Jim 20:18 68:2 76:7
group 33:8 34:10,16 35:3,7,16,18,22 36:2,7	I	Jim's 78:12
grouped 34:5	Idea 75:5	job 7:7 68:4
groups 34:7	igloo 54:4	jobs 10:14
guess 16:10 20:18 22:18 56:2	illegal 9:8	John 65:12
guys 15:16 72:6	Illinois 6:7	judgment 56:15 61:8
<b>H</b>		
hand 12:5 13:19 18:8 21:4 24:8 72:16	immediately 9:23	July 25:6 48:17,21 63:5,12,15,22 69:2
handle 11:3	impair 9:8	June 63:19,24
hang 77:15	important 7:8,13	
happened 20:20	included 33:10 34:4,15 35:2 77:12	K
he 32:11 37:18 45:9	indicated 14:21	keep 7:8,13 20:17 28:23 29:2,3,11,16 77:6
he's 32:11 44:14	individual 74:11	kind 6:4 10:18 19:23 21:11 50:14
head 7:11	individuals 44:9	know 7:1,18 12:7 13:16 14:1,2,20 16:7,14 18:14 19:10,12 22:6 24:9 29:3,5,13 35:21 36:1,4,14 37:19 39:7, 16 40:7 44:8,15,22 46:22,23 47:2 48:16 49:12 50:7 53:19 55:15,18,22 56:11 59:13 63:1 66:12,15,22 67:17 71:3,4 73:9
header 37:5,7,11 39:23 40:1,7,10 41:2	instruct 61:2,7 70:24	knowledge 33:18,22 34:1,3 36:9 40:5 45:9,12,14,17,18,22 46:1 56:19,21 61:5,6,11,13 68:22 69:5 71:9,12 74:6, 24 75:3
hear 6:21 7:1	Instructed 60:23 61:14,16,20 71:13, 19,22	
held 9:20 10:5,14	instructs 8:12	L
helpful 6:4	intend 15:11 57:18,22	last 5:11 9:6 19:7 20:16 23:10 28:8,11 56:5 68:16
her 20:23	intent 52:16 64:12 70:2,6	lasting 7:21
here 9:1,9 11:21 30:23 53:7,21 54:7 67:10 71:18,22 73:17 76:4,18,24	intention 50:13,24 51:20 64:18 70:10	law 20:3
herein 5:2	interest 15:4 25:17,18 48:4,6,11,21 49:11 50:1,6,13 51:1 52:17 56:14 57:4,18 58:18,20 61:3,8 64:6 68:17 70:2,8,10,15 71:1,11	lawsuit 11:22
hereinafter 5:4	interested 42:24	
high 11:13	interests 56:15	
highest 11:7	involved 10:18	
him 32:13 42:8 76:9		

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Index: least..occupations

<b>least</b> 67:4	<b>main</b> 37:9 69:1	<b>N</b>
<b>ledger</b> 38:11,24	<b>make</b> 7:1,8,13 8:8 11:15 13:8 15:22 30:23 33:9 61:23 66:15 68:3	<b>name</b> 5:8,11,16 9:11 23:12 35:11
<b>left</b> 8:20 15:3 30:6 54:2	<b>makes</b> 6:20 8:13 34:9	<b>Nancy</b> 5:1,9 8:17 32:8 37:22 38:16 42:18 59:17
<b>legal</b> 9:7 11:20 13:11,12 17:12 50:5,9	<b>management</b> 44:7,9	<b>Nate</b> 5:17 76:17
<b>less</b> 55:6	<b>manager</b> 9:13 10:2	<b>Nathan</b> 76:6,22,23 77:18
<b>letter</b> 18:15 30:5,9,12,18 31:12 33:11 34:15 35:1 43:3,10,12 44:2 46:18 47:1 57:1,5,9,22 58:9 59:13	<b>many</b> 7:24 11:18 19:6 32:17 <b>Mary</b> 18:9 69:14 77:13	<b>necessarily</b> 12:1 22:3 37:15 39:19
<b>letter-sender</b> 43:18	<b>matter</b> 5:18,19	<b>need</b> 7:18 8:3 16:1,2,11 20:15,19 31:20,21 37:22 66:17 67:6 72:13 78:7, 16
<b>letters</b> 43:20 46:8 73:13,14	<b>Maybe</b> 10:4	<b>needs</b> 7:23 77:16
<b>level</b> 11:7	<b>me</b> 5:3 6:8,22 7:1 10:18 12:7 14:1,2 18:14 20:12 22:8,9 23:2,19 24:9 26:21 30:17,23 31:1 33:9 38:11 39:1 41:15 44:1,20 45:13 46:6 49:18 50:24 51:5 55:20 56:1,7 58:5,9,14 66:1 67:14 71:19 72:4,8 73:9 75:15	<b>Next</b> 58:18,21
<b>liaison</b> 10:20 11:4 21:6	<b>mean</b> 16:4 22:19 40:9 58:16,19,22 59:6 60:10 71:7	<b>No.28093807001.</b> 62:9
<b>licensed</b> 11:16	<b>meaning</b> 58:10	<b>nods</b> 7:12
<b>like</b> 8:1,9 16:22 18:16 29:3 53:9 63:4 69:1,9 76:8 77:4 78:3,9,14	<b>means</b> 58:17,20 59:19	<b>Northern</b> 5:21
<b>likely</b> 8:8,11	<b>medical</b> 10:24 11:4	<b>note</b> 24:16 66:11
<b>likes</b> 29:4	<b>middle</b> 8:3 56:5,24	<b>notes</b> 25:2 27:14,16 29:15 36:23 39:24 41:2,7 47:12 54:13 55:24 56:3 62:7 63:11 65:18 66:2 67:3,11 69:6,10 72:5
<b>limited</b> 17:5	<b>minute</b> 20:14,17 32:7	<b>nothing</b> 49:5
<b>line</b> 20:12 30:16,17 72:14	<b>minutes</b> 53:10,11 72:3,8 76:8	<b>Notice</b> 12:14
<b>list</b> 12:23 31:18 33:14 34:4 40:2	<b>miscellaneous</b> 26:3 48:11,22 56:15 61:9 64:7 68:18 70:16	<b>Nowak</b> 20:21 46:16,23 67:7,8,22 68:5 76:14,19,21 78:9,15
<b>listed</b> 20:6 24:2 31:4,12,15 36:11 37:12,17 38:10,23 39:6,10,15 41:15, 24 42:6 55:24 56:20	<b>mispronounce</b> 5:16 45:19	<b>number</b> 39:23 40:1,16,20 60:6 67:5
<b>listing</b> 37:10	<b>missed</b> 20:13	<b>numbers</b> 39:22,24 40:4,14,22,23 67:14 73:21
<b>little</b> 6:21 44:20	<b>misunderstood</b> 30:20	<b>O</b>
<b>Lombard</b> 6:7	<b>moment</b> 37:21	<b>oath</b> 9:1 53:24
<b>long</b> 9:15 10:3 27:19,21 31:23,24 33:2 43:12 53:9	<b>money</b> 64:13,18	<b>Object</b> 41:18
<b>look</b> 12:6,7 13:17 24:8 30:16 38:21 40:16 54:3 56:1 64:22 65:11 67:20,23	<b>monies</b> 58:20	<b>objection</b> 8:13 26:12,15 38:13 42:14 50:8,15 51:12,23 52:20 58:12 59:16
<b>looking</b> 68:9 69:15,16	<b>months</b> 49:3	<b>objections</b> 8:8 13:7
<b>looks</b> 63:4 69:1,9	<b>more</b> 6:21 7:21 11:6 17:23 19:10 23:7 46:11 72:11	<b>obtained</b> 65:1
<b>lot</b> 31:19	<b>morning</b> 5:7,13,14 9:1 76:4	<b>obviously</b> 6:19 18:15
<hr/>		
<b>M</b>		
<b>ma'am</b> 50:19	<b>most</b> 67:4	<b>occupation</b> 9:12
<b>made</b> 15:6,9,10 28:5,6,8,11 35:15 44:9 55:11,13,17,18,20,23 56:9 63:12 69:2,10,21	<b>move</b> 67:12	<b>occupations</b> 10:15
<b>mail</b> 43:8,10	<b>movement</b> 7:12	

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
 Nancy Quiroga October 22, 2019

Job 31004  
 Index: October..putting

<b>October</b> 29:19 31:4 33:2	<b>paging</b> 67:14	<b>point</b> 5:16 7:22 30:23 31:23 45:3 71:1
<b>offensive</b> 7:17 8:24	<b>paid</b> 28:3,4,19,20,24 29:5,19 31:3,11, 17,24 32:19 33:1,3,6,7 37:18 41:12, 16,23 42:5 51:4 55:15	<b>policies</b> 16:13
<b>office</b> 6:6,7 7:8:12	<b>Parker</b> 44:12 45:9,12,14 46:3,19	<b>position</b> 15:10
<b>offices</b> 10:21,22	<b>Parker's</b> 44:13	<b>possession</b> 74:14
<b>Ohio</b> 5:21	<b>part</b> 74:2	<b>Possibly</b> 56:1
<b>once</b> 8:13 13:24	<b>participate</b> 73:3	<b>Practices</b> 19:16 45:24
<b>one</b> 6:7,8 15:3 19:5,10 32:18,22 35:15 37:21 41:20 55:20 72:11	<b>particular</b> 31:19 40:10 64:19	<b>pre-labeled</b> 12:13 24:7,15
<b>ones</b> 31:16 64:3	<b>parties</b> 60:20	<b>pre-marked</b> 12:5 13:19 18:9 24:7 36:17 47:4 53:3 54:4 61:24 65:12 72:17
<b>only</b> 8:2 15:3 30:5,8 72:7 78:6	<b>party</b> 55:23	<b>preceding</b> 9:23
<b>open</b> 15:22 29:12,16 76:15	<b>Pause</b> 14:4 41:8 66:13 72:10	<b>preparing</b> 44:17
<b>opinion</b> 11:20 17:12	<b>payment</b> 28:5,8,11 29:21,22 55:11, 13,16,21,24 56:9 63:12 69:2,6,7,10,21	<b>present</b> 6:9,11
<b>opinions</b> 13:12	<b>payments</b> 28:6	<b>presented</b> 12:11 13:22 18:11 24:12 36:19 47:8 53:5 62:3 65:14 72:19
<b>order</b> 77:17 78:3,6	<b>penalty</b> 9:4	<b>presume</b> 7:3
<b>originals</b> 77:15	<b>people</b> 6:20	<b>pretty</b> 58:10
<b>other</b> 6:11,15 7:20 9:20,21,24 10:6, 14,15 11:1,2,3 13:7,12 15:4 26:11 33:7,14 36:10,12 37:18 39:3,4 46:2,9, 19 50:1,6,13 51:1 52:18 56:12 57:7,22 58:22 59:4,14,23 61:9,12,19,21 64:2,7 66:11,20 68:18 70:6 71:6,14,23 74:20	<b>period</b> 43:16	<b>principal</b> 57:2 58:10,11
<b>otherwise</b> 36:6 49:19 60:22	<b>Periodically</b> 8:7	<b>print</b> 46:10,15
<b>our</b> 5:10 6:12,15 11:24 12:4 15:10 18:7,21 20:15 21:3 24:7 29:5 31:8 34:8 43:8	<b>perjury</b> 9:4	<b>printout</b> 25:1 47:18
<b>out</b> 16:19 47:3 54:6 61:24	<b>permission</b> 35:19,23 36:3,7	<b>prior</b> 10:5 45:6 46:5,20 47:1 66:22
<b>outlined</b> 22:2,4	<b>Pfeiffer</b> 6:14,15 44:11 45:20,22 46:3, 20	<b>probably</b> 35:13 72:7
<b>outstanding</b> 68:22	<b>phone</b> 6:8	<b>procedure</b> 15:12
<b>over</b> 6:4,8 27:6 43:14 50:20 58:18,21	<b>Physician</b> 24:17	<b>procedures</b> 16:13
<b>overview</b> 10:17	<b>pick</b> 53:13	<b>proceedings</b> 7:11 13:8
<b>owed</b> 33:15,16	<b>picked</b> 7:12	<b>Produced</b> 24:16 36:23 47:12 54:13 62:7 65:18
<b>own</b> 45:12 67:13	<b>pile</b> 12:3	<b>prosecution</b> 16:21
<b>owner</b> 44:14	<b>placed</b> 25:4,14 36:13 38:9 39:4 42:12 47:20 48:4,7 49:4,8 54:16,23 56:13 62:15,20 63:23 64:4 66:3 68:16	<b>provide</b> 31:7
<hr/>		<b>provided</b> 74:17,20
<b>P</b>		<b>providers</b> 10:24
<b>p.m.</b> 78:21	<b>placement</b> 25:19,22 26:1,4,7 27:2 48:13 54:20 56:16 62:18 63:18 66:6 68:10 71:16,17,21	<b>pull</b> 47:3 54:5 61:24
<b>page</b> 12:21,22 14:11,13 23:10 56:4,5 63:10 64:20 66:10 67:5,10,13 69:1,15, 18 73:7,22	<b>places</b> 21:11	<b>purpose</b> 29:2 65:2
<b>pages</b> 66:11,22 67:24 75:15	<b>plaintiff</b> 5:2,18 73:13 74:5 77:19	<b>push</b> 31:20
	<b>Plaintiff's</b> 72:22	<b>put</b> 13:15 15:11 27:1 63:18
	<b>please</b> 5:8,11 6:12 7:1 9:12 15:1 18:14 32:8,14 34:20 37:21 52:24 66:7 73:6	<b>putting</b> 15:8

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Index: Q-U-I-R-O-G-A..sent

Q		
<b>Q-U-I-R-O-G-A</b> 5:12	71:11,24 75:17	76:12
<b>qualifications</b> 20:23	<b>rejoining</b> 20:11	<b>right-hand</b> 66:10
<b>question</b> 7:2,3,4 8:3,4,9,14 9:6 26:18 32:8,9,13,14 33:2 34:21,24 39:9,18 45:2 46:6,12 50:19 51:13,15 52:14	<b>related</b> 16:12	<b>Robie</b> 5:19 29:8,10
<b>questioning</b> 77:3	<b>relationship</b> 33:19,23 34:3	<b>role</b> 9:16,21,24 10:3,5,19 21:6
<b>questions</b> 11:6 20:22 41:20 76:2,10 77:2,21,24	<b>relevant</b> 30:9	<b>roles</b> 9:20 10:6
<b>quick</b> 61:23	<b>rely</b> 18:19	<b>room</b> 6:12,13,17 7:10,23
<b>Quiroga</b> 5:1,9,13,23	<b>relying</b> 17:7	<b>rules</b> 6:4
R		<b>S</b>
<b>R-E-N-K-I-M</b> 75:2	<b>remain</b> 33:6 68:21	<b>said</b> 5:4 32:11 39:10
<b>Randy</b> 44:12	<b>remaining</b> 28:12 30:4	<b>same</b> 56:4 63:17,22 69:11
<b>read</b> 20:16 34:20,22 41:7	<b>remember</b> 8:19 24:23 37:3	<b>satisfied</b> 27:10 28:1 47:23 48:17,20, 24 49:5 51:6 62:23 63:2,5,15,21
<b>reading</b> 63:4 65:3	<b>remind</b> 7:16	<b>saw</b> 12:19 24:21
<b>really</b> 22:6 24:23 36:14 55:22	<b>Renkim</b> 43:11,12,17,20,23 74:24 75:3,6,9	<b>say</b> 8:23 10:8 17:18 19:15,24 21:20 26:16 29:6 31:10 40:3 43:14 48:9,10 50:20 63:20
<b>reason</b> 6:24 75:13,22	<b>repeat</b> 7:2 34:18 38:18 52:23	<b>saying</b> 42:19
<b>received</b> 27:9	<b>rephrase</b> 38:18 44:20	<b>says</b> 64:24 66:10
<b>receiving</b> 59:12	<b>reporter</b> 6:12,16 11:24 12:4 13:19 18:8 20:16 21:4 24:8 34:20,22 72:16 75:1 77:5,15,17 78:2,8,13	<b>scanned</b> 78:14
<b>recess</b> 53:16	<b>reporter's</b> 5:10 68:4	<b>school</b> 11:13
<b>record</b> 5:8 12:13 14:7 15:1,22 18:19 24:15 40:11 47:10 52:23 54:11 62:5 65:16 68:3,6,8 72:21 76:10,13,16 77:4,8,20	<b>representative</b> 5:17 13:4	<b>second</b> 30:4 33:10
<b>records</b> 29:4 31:7 36:6	<b>request</b> 41:5 73:11	<b>second-to-last</b> 14:11,13
<b>Recycling</b> 47:13 49:14,21	<b>Requests</b> 72:23	<b>see</b> 12:3,24 18:3 27:17 29:4,17 37:2 41:9 46:6 56:6 76:9
<b>refer</b> 37:5	<b>requirements</b> 21:22 22:1	<b>seek</b> 17:2
<b>reference</b> 54:14 60:6 62:8 65:19	<b>reserve</b> 78:1	<b>seeking</b> 57:8 64:5
<b>referring</b> 17:19,24 18:24 19:15 20:3,5 22:20	<b>reserved</b> 78:22	<b>seem</b> 67:19
<b>reflect</b> 62:14	<b>resolved</b> 52:6,9,11	<b>seems</b> 67:12,13
<b>reflected</b> 27:14 29:14 30:11 69:6,17	<b>respect</b> 37:13 42:24 56:23 58:8	<b>seen</b> 12:16 24:19 36:24 47:15 54:8 62:11 65:22 73:1
<b>regarding</b> 17:16,18 20:4 25:11 32:1 38:10 39:5 41:3 46:17 50:1 51:1 60:8 64:16 67:6 78:5	<b>response</b> 16:7 74:2	<b>self-training</b> 19:23,24
<b>regards</b> 19:8,21 20:8 45:15 54:18 57:18 60:3,5 61:9 62:16 64:13 70:8	<b>Responses</b> 72:22	<b>send</b> 32:1 33:4 43:20,23 46:4 78:12
	<b>result</b> 55:10	<b>sender</b> 43:13
	<b>retain</b> 74:10	<b>sends</b> 42:11 74:11
	<b>reversed</b> 69:2,7,10	<b>sent</b> 17:21 18:1,20 27:6 31:5 41:5 43:3,5,7,10 45:7 46:5,21 47:1 49:24 50:4,11,22 52:12,15 57:2,5,17,22,23 60:2 64:11,16 65:6 69:21 70:1,5 73:13 74:5

**ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO**  
Nancy Quiroga October 22, 2019

Job 31004  
Index: sentence..today

<b>sentence</b>	64:23	<b>specifically</b>	46:17 73:24	
<b>serve</b>	10:3	<b>speculating</b>	67:10,17	<b>T</b>
<b>served</b>	9:16	<b>spell</b>	5:11	
<b>service</b>	43:8,10	<b>spelled</b>	75:1	
<b>services</b>	9:13 21:8	<b>spending</b>	30:2	
<b>set</b>	17:11 19:3,5 39:22 67:13 72:22	<b>staff</b>	10:21,22	
<b>settled</b>	52:2	<b>stands</b>	17:4	
<b>several</b>	35:13,14	<b>start</b>	32:22 46:11 60:13 67:4	
<b>she</b>	42:21 45:20	<b>starts</b>	67:11	
<b>sheet</b>	12:23	<b>state</b>	5:7 6:13 9:12 63:11 77:5	
<b>shorthand</b>	19:14	<b>stated</b>	9:11 32:18 35:9 48:16 70:9 74:3	
<b>should</b>	11:24 49:10,20	<b>statement</b>	65:4,7	
<b>signature</b>	78:1,22	<b>states</b>	29:15 59:22	
<b>Since</b>	27:24 70:14	<b>still</b>	33:4 55:2 74:7	
<b>sincerely</b>	76:3	<b>stipulate</b>	14:24 16:1	
<b>sit</b>	55:2 71:18,22 73:17	<b>stipulating</b>	16:9	
<b>sits</b>	56:18	<b>strike</b>	23:2 30:23 31:2 38:7 43:23 45:13 48:5 51:5 60:2,4,20 71:20 75:15	
<b>skip</b>	18:14	<b>subject</b>	9:3 50:16 76:2	
<b>slightly</b>	55:6	<b>substance</b>	44:22 53:19	
<b>snapshot</b>	57:9,20,24 70:12	<b>substances</b>	9:7	
<b>software</b>	34:8,10	<b>suppose</b>	23:8	
<b>some</b>	11:9 12:1 16:20 18:20 20:22 67:2,6 73:21	<b>sure</b>	7:2,8,13 11:15 16:6 20:20 22:21 30:2 33:9 34:19 38:14 39:11 43:16 44:21 50:21 51:3,9 63:21 66:15	
<b>someone</b>	46:9,13	<b>sworn</b>	5:3	
<b>something</b>	15:17 16:2,18,21	<b>system</b>	5:20 9:14,21 10:1,6,9,24 13:3 14:18 17:14,20 18:1,21 19:7 21:8,12, 13,14,22 22:8,9 23:1,13,21 24:1 25:4, 9,14 26:10 27:1,9,20,21 28:7,9,12,22 29:5,11,16 31:5,11,14,24 33:3 34:12 35:18,22 36:2,5,13,22 37:13 38:9 39:5 40:6 42:11 43:8,9,13,18,21 44:1,5,23 47:11,21 48:7,13 49:4,9,14,19,23	
<b>sorrt</b>	11:10		50:11,22,23 51:9,20 52:5,15 54:12,17, 23 55:7,18 56:13 57:8,17,21 60:7,19, 22 61:3,7,13 62:7,15 63:18,23 64:5, 12,17 65:6,17 66:3 68:17 70:1,5,9,14, 21 71:1,19 72:21 73:12,15 74:3,9,13, 21 75:6,10	
<b>sought</b>	68:19	<b>time</b>	6:3 10:15 12:18 24:21 26:10 27:8,10 28:16 30:2 31:19 37:19 48:9, 13,23 49:3,5,23 50:4,11,21 52:12,14 57:1,5,16,20,21,24 60:1 62:20 63:14 64:4,9,10,16 66:16 68:13,16 69:20,24 70:3,4,9,13,14 71:16,17,21 76:4	
<b>sounds</b>	53:12	<b>title</b>	44:13	
<b>speak</b>	38:3,4 53:20	<b>today</b>	5:16 7:22 9:9 11:21 12:16 16:17 24:19 36:24 47:15 53:21 54:9 55:2 62:12 65:22 71:18,22 73:1,17	
<b>speaker</b>	76:14			
<b>speaking</b>	29:6,7,8 38:12,24			
<b>special</b>	45:15			
<b>specific</b>	17:23 21:10 23:7 74:10			

ROBIE GASTON vs FINANCE SYSTEM OF TOLEDO  
Nancy Quiroga October 22, 2019

Job 31004  
Index: together..years

**together** 34:6,7,10,17 35:4,8,10,16,  
19,23 36:3,8 38:22  
**Toledo** 5:20 9:14,21 10:1,6,9 13:3  
14:18 17:14,21 18:1,21 19:7 21:12,13,  
23 22:8,10 23:1,13,14,18,21 24:1,2  
25:4,9,14 26:11 27:1,9,20,22 28:7,9,  
12,22 29:11,16 31:5,11,15 32:1,23  
33:4,19,24 34:12 35:18,22,23 36:5,13,  
23 37:13 38:9 39:5 40:6,19,24 42:4,11  
43:13,18,21 44:1,5,23 47:12,21 48:7,  
13 49:4,10,15,20,23 50:11,22,23  
51:10,20 52:5,16 54:13,17,23 56:14  
57:8,17,21 60:8,19,23 61:2,3,6,7,14,  
17,20 62:7,8,15,16 63:18,23 64:5,12,  
17 65:6,18 66:3 67:9 68:17 70:1,5,10,  
15,21,24 71:1,10,13,23 72:22 73:12  
74:3,9,13,21 75:6,10

**Toledo's** 10:24 21:8 43:9 73:15  
**top** 30:17 32:22 63:10 65:24 66:10  
**topic** 16:24  
**topics** 12:23,24 13:4,9,13 16:12  
**towards** 63:10  
**trailer** 39:24 40:4  
**training** 19:21 45:15,23  
**transcribed** 7:11  
**transcript** 78:4,10  
**true** 75:15,19  
**turn** 23:10 36:16 53:2

**turns** 16:19

**two** 7:21 10:4 19:8 28:6 41:19 49:2,3  
56:8

## U

**Uh-huh** 45:1 73:8  
**under** 5:21 9:1,6 40:1 53:24 57:7  
59:22  
**understand** 7:4 8:24 16:23 20:23  
31:21 32:4,5,12 33:9 38:14,15 46:6  
50:19 53:23  
**understanding** 11:21 13:2 14:17  
17:13 19:14  
**understood** 7:14 8:14 16:16 26:20  
**Unless** 8:12

**until** 27:9 33:7  
**up** 7:13 9:17 26:22 38:3,4 40:17 53:13  
**update** 42:12  
**upon** 5:2  
**use** 15:3 32:6,20 51:24  
**used** 44:18 45:3 46:4,18 65:1 77:11  
**using** 12:2 13:16 19:13 33:5  
**utilize** 21:7

## V

**vague** 26:18 50:17

**value** 57:14

**variables** 31:19,22 32:17,19

**Various** 36:23

**verbal** 7:9,14 49:18,19

**Volheim** 5:6,17 8:22 12:12,15 13:23  
14:6,9,20 15:15,24 17:8,10 18:7,12,  
19,22 20:15 21:2 22:21,23 24:14,18  
26:14,21,23 30:7,10,15,21 32:15  
34:19 35:6 36:15,21 37:20 38:6,20  
39:13 40:12,18 41:11,21 42:16,23  
43:2 47:10,14 50:10,18 51:18 52:4,22  
53:8,12,17 54:11,15 58:15 59:20  
60:12,14 62:5,10 65:16,21 66:14 67:1,  
16 68:2,7 72:2,11,20,24 76:1,11,17,24  
77:18,19 78:3,5,16

## W

**wait** 32:7,9 72:7

**waiting** 66:16,17,19

**wanted** 70:21

**website** 20:6

**well** 6:9 11:1,4 13:17 15:2,24 23:7  
31:14,20 39:17 63:7 67:22

**went** 44:2 68:8

**whatsoever** 33:19

**whole** 6:2

**withdrawing** 14:22 15:17

**withdrawn** 14:18 16:15

**wondering** 8:21

**word** 15:4 51:24 58:11 59:4,14

**work** 35:9

**worked** 31:18 33:7

**working** 35:12,15

**worried** 66:19

**written** 22:19,24 23:3,5,17,20,24 36:6  
49:13,18 60:10,13,15,18,22 70:19  
74:4

**wrong** 17:15

## Y

**years** 9:17 10:4,9,10,12 19:8 43:14  
49:2



# Exhibit A

## Amended Notice of Deposition

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

ROBIE GASTON,

Plaintiff,

v.

FINANCE SYSTEM OF TOLEDO, INC.,

Defendant.

3:18-cv-02652

**AMENDED NOTICE OF DEPOSITION**

To: Finance System of Toledo, Inc.  
c/o Law Office of Boyd W. Gentry  
4031 Colonel Glenn Highway  
Beavercreek, OH 45431  
[zelliott@boydgentrylaw.com](mailto:zelliott@boydgentrylaw.com)  
[bgentry@boydgentrylaw.com](mailto:bgentry@boydgentrylaw.com)

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the undersigned will take the deposition by oral examination of certain designated representative(s) of the following party on the date and time indicated below:

**Finance System of Toledo, Inc. (“FST”)**

**October 22, 2019 at 10:00 a.m. CST**

The deposition will take place telephonically from 2500 S. Highland Avenue, Suite 200, Lombard, Illinois 60148 on the one end and a location in Toledo, Ohio on the other. **We will provide that location soon.** The deposition will be recorded by stenographic means. The deposition will continue until completed. The deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure.

FST is hereby notified of its duty, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, to designate one or more officers, directors, agents or other persons who will testify on its behalf and, for each person so designated, to set forth the matters upon which the person will testify. Definitions for all applicable terms below are given the same meaning as in Plaintiff's Interrogatories to FST issued on April 23, 2019.

1. FST's relationship with Toledo Clinic, Inc. as it relates to Plaintiff.
2. FST's relationship with Allstar Disposal as it relates to Plaintiff.
3. FST's relationship with EPNO of Toledo, Inc. as it relates to Plaintiff.
4. In depth discussion regarding the allegations against FST as set forth in Plaintiff's Complaint.
5. In depth discussion on any correspondence FST caused to be sent to Plaintiff.
6. In depth discussion on the identity and duties of any third-party service providers employed by FST to assist in sending correspondences to Plaintiff.
7. Claims and defenses of the parties, the parties' discovery requests and responses, and all documents disclosed, produced, or required to be produced by either party in connection with the case.
8. In depth discussion on FST's collections systems used in conjunction with Plaintiff.
9. In depth discussion on all documentation methods, if any, whether computerized, manual, or other, of all activities undertaken by FST or their employees related to the collection of Plaintiff's account.
10. In depth discussion on FST's methods of communications as they relate to delinquent consumer accounts.
11. In depth discussion on FST's training of employees in its collections department.
12. In depth discussion on all documents produced to Plaintiff by FST in the course of this case.

13. In depth discussion on all policy, procedure and training manuals, memoranda and other writings regarding collection activities of FST which were in effect and used for a period of five (5) years prior to the date of this notice to the present relating to Plaintiff's account.
14. The relationship between FST and Plaintiff.
15. FST's Answer to Plaintiff's Complaint.
16. FST's affirmative defense(s) as raised in its Answer to Plaintiff's Complaint.
17. FST's responses to Plaintiff's Interrogatories.
18. FST's responses to Plaintiff's Requests for Production.
19. FST's responses to Plaintiff's Requests for Admission.
20. FST's training process for training employees to be compliant with state and federal laws.
21. In depth discussion on the procedures employed by FST to comply with the Fair Debt Collection Practices Act.
22. The process and procedures that govern the drafting of any correspondences sent to Plaintiff by FST.
23. The review process of any correspondence sent to Plaintiff.

s/ Nathan C. Volheim  
Nathan C. Volheim, Esq. #6302103  
*Counsel for Plaintiff*  
Sulaiman Law Group, Ltd.  
2500 South Highland Ave, Suite 200  
Lombard, Illinois 60148  
(630) 630-568-3056 (phone)  
(630) 575-8188 (fax)  
nvolheim@sulaimanlaw.com

**CERTIFICATE OF SERVICE**

The undersigned, one of the attorneys for Plaintiff, certifies that on September 23, 2019, he caused a copy of the foregoing *Amended* Notice of Deposition, to be served by electronic mail on:

James S. Nowak  
4808 North Summit Street  
Toledo, OH 43611  
[joffice@bex.netjoffice](mailto:joffice@bex.netjoffice)

Law Offices of Boyd W. Gentry  
Attn: Boyd W. Gentry  
Attn: James S. Nowak  
4031 Colonel Glenn Highway  
Beavercreek, OH 45431  
[zelliott@boydgentrylaw.com](mailto:zelliott@boydgentrylaw.com)  
[bgentry@boydgentrylaw.com](mailto:bgentry@boydgentrylaw.com)

s/ Nathan C. Volheim  
Nathan C. Volheim  
*Counsel for Plaintiff*

# Exhibit B

Answer to Complaint with  
Counterclaims

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

ROBIE GASTON, : CASE NO. 3:18-cv-02652 - JJH  
Plaintiff, :  
v. :  
FINANCE SYSTEM OF TOLEDO, INC., :  
Defendant. :

---

**ANSWER TO COMPLAINT;  
WITH COUNTERCLAIM**

---

Now comes Defendant, by counsel, and provides the following for its Answer and Counterclaim.

COMPLAINT 1. Plaintiff brings this action for damages pursuant to the Fair Debt Collection Practices Act (“FDCPA”) under 15 U.S.C. §1692 et seq., for Defendant’s unlawful conduct.

**ANSWER 1. Denied**

COMPLAINT 2. This action arises under and is brought pursuant to the FDCPA. Subject matter jurisdiction is conferred upon this Court by 28 U.S.C. §§1331 and 1337 as the action arises under the laws of the United States.

**ANSWER 2. Denied**

COMPLAINT 3. Venue is proper in this Court pursuant to 28 U.S.C. §1391 as Defendant conducts business in the Northern District of Ohio and a substantial portion the events or omissions giving rise to the claims occurred within the Northern District of Ohio.

**ANSWER 3. Admitted**

COMPLAINT 4. Plaintiff is a 54 year-old natural person residing in Toledo, Ohio which falls within the Northern District of Ohio.

**ANSWER 4. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.**

COMPLAINT 5. Defendant promotes that it “is one of the largest and most experienced full-service collection agencies in Northwest Ohio.” Defendant is a corporation formed under the laws of the State of Ohio with James Nowak as its registered agent, located at 4808 North Summit, Toledo, Ohio 43611. Defendant uses the mail and telephone for the

principal purpose of collecting debts from consumers on a nationwide basis, including consumers in the State of Ohio.

**ANSWER 5. Admitted**

COMPLAINT 6. Defendant acted through its agents, employees, officers, members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives and insurers at all times relevant to the instant action.

**ANSWER 6. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.**

COMPLAINT 7. Upon information and belief, Plaintiff received medical services at The Toledo Clinic ("Toledo Clinic") on several occasions.

**ANSWER 7. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.**

COMPLAINT 8. Due to financial hardship, Plaintiff fell behind on his payments to Toledo Clinic, thus incurring debt ("subject consumer debts").

**ANSWER 8. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.**

COMPLAINT 9. Plaintiff incurred the subject consumer debts for personal services related to his healthcare.

**ANSWER 9. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.**

COMPLAINT 10. Between the spring of 2017 and the spring of 2018, Toledo Clinic charged-off the subject consumer debts and sold the collection rights to Defendant.

**ANSWER 10. Denied**

COMPLAINT 11. The Toledo Clinic stopped sending statements to Plaintiff when it charged-off the subject consumer debts.

**ANSWER 11. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.**

COMPLAINT 12. Upon information and belief, the balances of the subject consumer debts are \$775.30 and \$435.00.

**ANSWER 12. Defendant is without sufficient knowledge to enable it to admit or deny this allegation and therefore denies it.**

COMPLAINT 13. Defendant purchased the subject consumer debts while Plaintiff was in default.

**ANSWER 13. Denied**

COMPLAINT 14. Defendant has sought collection of the subject consumer debts from Plaintiff through collection correspondences.

**ANSWER 14.** Defendant admits that it sent correspondence to Plaintiff in an attempt to collect on an account. Defendant is without sufficient knowledge to enable it to admit or deny the remainder of the allegations in paragraph 14 and therefore denies them.

COMPLAINT 15. Defendant's collection efforts included sending correspondences dated January 15, 2018 and April 5, 2018. In those correspondences Defendant failed to disclose itself as a debt collector as shown in the language which appeared as follows:

**ANSWER 15.** Defendant admits that it sent correspondence to Plaintiff in an attempt to collect on an account. All other allegations in paragraph 15 are denied.

COMPLAINT 16. In its January 15, 2018 correspondence, Defendant included language which appeared as follows:

**ANSWER 16.** Defendant admits that the letter speaks for itself and denies all other allegations in paragraph 16.

COMPLAINT 17. Plaintiff received both correspondences from Defendant and was misled as to his rights and obligations.

**ANSWER 17. Denied.**

COMPLAINT 18. In Defendant's correspondence, Defendant included line items for interest and other costs.

**ANSWER 18.** Defendant admits that the letter speaks for itself and denies all other allegations in paragraph 18.

COMPLAINT 19. Accordingly, Plaintiff was falsely led to believe that Defendant had the lawful ability to collect interest and other costs.

**ANSWER 19. Denied**

COMPLAINT 20. Plaintiff spoke with Sulaiman regarding the correspondences resulting in pecuniary loss and expenditure of resources.

**ANSWER 20. Denied**

COMPLAINT 21. Plaintiff has suffered concrete harm as a result of Defendant's actions, including but not limited to, invasion of privacy, confusion, and aggravation.

**ANSWER 21. Denied**

COMPLAINT 22. Plaintiff repeats and realleges paragraphs 1 through 21 as though fully set forth herein.

**ANSWER 22.** Defendant incorporates its prior responses as though fully set forth herein.

COMPLAINT 23. Plaintiff is a "consumer" as defined by 15 U.S.C. §1692a(3) of the FDCPA.

**ANSWER 23.** Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 23 and therefore denies them.

COMPLAINT 24. Defendant is a “debt collector” as defined by §1692a(6) of the FDCPA, because it regularly uses the mail and/or the telephone to collect, or attempt to collect, delinquent consumer accounts.

**ANSWER 24. Admitted**

COMPLAINT 25. Defendant identifies itself as a debt collector on its website, and is engaged in the business of collecting or attempting to collect, directly or indirectly, defaulted debts owed or due or asserted to be owed or due to others. Defendant has been a member of the Association of Credit and Collection Professionals, an association of debt collectors, since 1954.

**ANSWER 25. Admitted**

COMPLAINT 26. The subject consumer debts are “debt[s]” as defined by FDCPA §1692a(5) as they arise out of a transaction due or asserted to be due to another for personal, family, or household purposes.

**ANSWER 26. Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 26 and therefore denies them.**

COMPLAINT 27. The FDCPA, pursuant to 15 U.S.C. §1692e, prohibits a debt collector from using “any false, deceptive, or misleading representation or means in connection with the collection of any debt.”

**ANSWER 27. Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 27 and therefore denies them.**

COMPLAINT 28. In addition, this section enumerates specific violations, such as: “The false representation of – the character, amount, or legal status of any debt . . .” 15 U.S.C. § 1692e(2).

“The threat to take any action that cannot legally be taken or that is not intended to be taken.” 15 U.S.C. § 1692e(5).

“The use of any false representation or deceptive means to collect or attempt to collect any debt or to obtain information concerning a consumer.” 15 U.S.C. §1692e(10); and

“The failure to disclose in the initial written communication with the consumer and, in addition, if the initial communication with the consumer is oral, in that initial oral communication, that the debt collector is attempting to collect a debt and that any information obtained will be used for that purpose, and the failure to disclose in subsequent communications that the communication is from a debt collector, except that this paragraph shall not apply to a formal pleading made in connection with a legal action.” 15 U.S.C. §1692e(11).

**ANSWER 28. Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 28 and therefore denies them.**

COMPLAINT 29. Defendant violated 15 U.S.C. §§ 1692e, e(2), e(5), and e(10) through the inclusion of language mentioning interest and costs. The inclusion of this language misleadingly suggests to consumers the false possibility that Defendant could collect an amount that would be above and beyond that which was outlined as the total due on the

collection correspondence. The subject consumer debts were charged-off by Toledo Clinic in the amount of \$775.30. Upon charge-off, Toledo Clinic and its successors waived the right and ability to add interest and other charges, as evidenced by Defendant seeking to collect the same amount of \$775.30 and the fact that Toledo Clinic stopped sending periodic billing statements for the subject consumer debts. It was a legal impossibility for Defendant to add interest and other charges to the subject consumer debts at the time the correspondence were sent. Defendant purposefully included this misleading language to instill a false sense of urgency in Plaintiff so that he would feel compelled to make payment.

**ANSWER 29. Denied.**

COMPLAINT 30. Defendant violated 15 U.S.C. §§ 1692e, e(10), and e(11) through its failure to disclose itself as a debt collector. By failing to disclose itself as a debt collector, Defendant deceptively and misleadingly attempted to obscure Plaintiff's rights under the FDCPA. Consequently, Defendant's objective was to obfuscate its status as a debt collector in order to prevent Plaintiff from believing that he was afforded certain FDCPA protections against Defendant.

**ANSWER 30. Denied.**

COMPLAINT 31. The FDCPA, pursuant to 15 U.S.C. §1692f, prohibits a debt collector from using "unfair or unconscionable means to collect or attempt to collect any debt."

**ANSWER 31. Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 31 and therefore denies them.**

COMPLAINT 32. In addition, this section enumerates specific violations, such as: "The collection of any amount (including any interest, fee, charge, or expense incidental to the principal obligation) unless such amount is expressly authorized by the agreement creating the debt or permitted by law." 15 U.S.C. §1692f(1).

**ANSWER 32. Defendant is without sufficient knowledge to enable it to admit or deny the allegations in paragraph 32 and therefore denies them.**

COMPLAINT 33. Defendant violated §1692f and f(1) when it unfairly suggested that it could collect additional amounts above and beyond the total balance due as represented in the correspondence. Because Defendant was precluded from adding anything to the balances of the subject consumer debts as its right to do so was waived, the above referenced portions of correspondence violate the FDCPA.

**ANSWER 33. Denied.**

COMPLAINT 34. Defendant further violated §1692f when it unfairly and unconscionably attempted to collect on a debt by concealing its status as a debt collector. Failing to disclose itself as a debt collector is an unfair and unconscionable act intended to confuse Plaintiff regarding the status and identity of the debt collector and unlawfully designed shield itself from any potential retaliation.

**ANSWER 34. Denied.**

COMPLAINT 35. As pled in paragraphs 19 through 21, Plaintiff has been harmed and suffered damages as a result of Defendant's unlawful actions.

**ANSWER 35. Denied.**

All other allegations in the Complaint are denied.

**ADDITIONAL DEFENSES**

1. Plaintiff's claims are barred by the applicable statute of limitations.
2. Plaintiff's injuries or damages, if any, are the result of her own acts or omissions.
3. Pursuant to 15 USC § 1692k, any violations that may be found were not intentional and resulted from a bona fide error notwithstanding the maintenance of procedures reasonably adapted to avoid such error.
4. Plaintiff lacks standing, as Plaintiff did not suffer an injury or loss sufficient to have standing.
5. Defendant relied upon and acted in good faith conformity with a prior opinion from the Federal Trade Commission. 15 U.S.C. 1692k(e).

**COUNTERCLAIM**

As set forth in the Fair Debt Collection Practices Act, 15 U.S.C. § 1692k, Defendant is entitled to attorney fees and its cost of defending this matter.

Respectfully Submitted,

/s/James S. Nowak  
James S. Nowak (0012890)  
4808 N. Summit St.  
Toledo, Ohio 43611  
Phone: (419) 726-2605  
Fax: (419) 726-1549  
*Attorney for Finance System of Toledo, Inc.*

/s/Boyd W. Gentry  
Boyd W. Gentry (0071057)  
Zachary P. Elliott (0090057)  
Law Office of Boyd W. Gentry, LLC  
4031 Colonel Glenn Highway, First Floor  
Beavercreek, Ohio 45431  
Phone: (937) 839-2881  
Fax: (800) 839-5843  
[bgentry@boydgentrylaw.com](mailto:bgentry@boydgentrylaw.com)

[zelliott@boydgentrylaw.com](mailto:zelliott@boydgentrylaw.com)  
Attorneys for Finance System of Toledo, Inc.

**CERTIFICATE OF SERVICE**

I certify that the foregoing was filed with the Clerk of Court's CM/ECF system which will provide electronic service to all counsel on January 24, 2019.

/s/Boyd W. Gentry  
Boyd W. Gentry (0071057)

# Exhibit C

Def. FST Responses to Pla.  
First Set of Combined  
Discovery Requests

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

Robie Gaston,	:	Case No: 3:18-cv-02652-JJH
	:	
Plaintiff,	:	Judge: Helmick
v.	:	
Finance System of Toledo, Inc.,	:	Defendant Finance System of Toledo,
Defendant.	:	Inc.'s Responses to Plaintiff's First Set of
	:	Combined Discovery Requests
	:	

---

Now comes Defendant Finance Systems of Toledo, Inc. (“FST”) and provides the following for its responses to Plaintiff Robie Gaston’s (“Gaston”) first set of combined discovery requests directed to it.

**General Objections**

1. FST’s general objections to Gaston’s discovery requests are made without waiver of or prejudice to specific objections that are made.
2. FST objects to each discovery request to the extent that the information or documentation requested is protected from discovery by the attorney-client privilege, work-product doctrine or other applicable privileges or immunities.
3. FST objects to each and every discovery request to the extent that the information requested is irrelevant, duplicative, unreasonably vague, overbroad, repetitious, unduly burdensome, equally accessible to each party, not important in resolving the issues of the case, or purports to require the disclosure of information beyond the scope of permissible discovery under the Federal Rules of Civil Procedure.

**REQUESTS FOR ADMISSION**

1. Admit that You are in the business of using the mail system to collect consumer debts originally owed to others.

**ANSWER:**

**Admitted, but Defendant does not know if any particular account is a “debt” under 15 U.S.C. 1692a.**

2. Admit that You are a business whose principal purpose is the collection of debts.

**ANSWER:**

**Admitted, but Defendant does not know if any particular account is a “debt” under 15 U.S.C. 1692a.**

3. Admit that You are a debt collector as defined by the Fair Debt Collection Practices Act (“FDCPA”).

**ANSWER:**

**Admitted, but Defendant does not know if any particular account is a “debt” under 15 U.S.C. 1692a.**

4. Admit that You sent the collection letters as discussed in Plaintiff's complaint.

**ANSWER:**

**Denied. Defendant does not know what letters to which this request refers as the complaint alleges certain letters that were not sent by Defendant.**

5. Admit that the collection letters You sent to Plaintiff are form letters.

**ANSWER:**

**Admitted.**

6. Admit that you were not the creditor or holder of the debt with regard to the collection letters You sent to Plaintiff.

**ANSWER:**

**Admitted.**

7. Admit that Your collection department utilizes technology or software that generates or creates the collection letters You sent to Plaintiff.

**ANSWER:**

**Admitted that Defendant uses technology or software to generate or request letters, but Defendant does not know what letters to which this request refers as the complaint alleges certain letters that were not sent by Defendant.**

8. Admit that Your collection department utilizes technology or software that generates or creates portions of the collection letters You sent to Plaintiff.

**ANSWER:**

**Admitted that Defendant uses technology or software to generate or request letters, but Defendant does not know what letters to which this request refers as the complaint alleges certain letters that were not sent by Defendant.**

9. Admit that You contract with or otherwise utilize a third party to create or generate all or portions of the collection letters You sent to Plaintiff.

**ANSWER:**

**Admitted that Defendant utilizes a third party, on occasion, to generate or request letters, but Defendant does not know what letters to which this request refers as the complaint alleges certain letters that were not sent by Defendant.**

## **INTERROGATORIES**

Defendant is required to provide a written response to the following interrogatories:

1. State the name, address and title of each and every party or individual providing any information or documents with respect to the answers to these Interrogatories, Requests to Produce, and Requests to Admit.

### **RESPONSE:**

**Nancy Quiroga, Client Services Manager  
Amy Pfeiffer, Collection Manager  
Finance System of Toledo, Inc.  
PO Box 351297  
Toledo, Ohio 43537-1297**

**Ms. Quiroga and Ms. Pfeiffer are represented by the undersigned and may be contacted through the undersigned counsel.**

2. Please identify by name, case number, and jurisdiction, any and all cases where Defendant has been found to have violated and/or has been alleged to have violated the Fair Debt Collection Practices Act (“FDCPA”), or where Defendant settled an FDCPA violation or alleged violation by way of payment of any United States currency. This question relates to any such actions taken within five (5) years of the date of the filing of the underlying lawsuit.

### **RESPONSE:**

**Objection. This request calls for information that has no relevance to the claims and defenses in this case. The Federal Rules of Civil Procedure require that discovery requests to be relevant. Beyond this though, this discovery request is overly broad and unduly burdensome, it has no importance in resolving the claims in this case, the burden and expense far outweigh the benefits because there would be no benefits to providing this information in discovery.**

3. State the name, address, title, and job description of each of Your employee(s) who had oversight of or otherwise controlled the creation of the collection letters sent by You to Plaintiff.

### **RESPONSE:**

**Amy Pfeiffer, Collection Manager  
Nancy Quiroga, Client Services Manager  
Finance System of Toledo, Inc.**

**PO Box 351297  
Toledo, Ohio 43537-1297**

4. State the name, address, title, and job description of each individual who authorizes or approves the content, nature, and/or structure of the collection letters sent to Plaintiff.

**RESPONSE:**

**Amy Pfeiffer, Collection Manager  
Nancy Quiroga, Client Services Manager  
Finance System of Toledo, Inc.  
P.O. Box 351297  
Toledo, Ohio 43537-1297**

5. Please provide a detailed description of the services that You perform for the original creditor(s) of the debt(s) You were collecting on when communicating with Plaintiff.

**RESPONSE:**

**Objection. “Detailed” is vague and ambiguous. Defendant performs account management services for the creditors at issue, including attempted communications with Plaintiff via telephone and letters. Defendant also received and processed numerous payments from Plaintiff.**

6. Please state the number of collection letters You have sent to any accounts that You service, or upon which you were collecting a debt, during the relevant time period, and indicate the number of collection letters sent per month, and indicate the method of delivery, whether by U.S. mail or otherwise.

**RESPONSE:**

**Objection. This request calls for information that has no relevance to the claims and defenses in this case and thus, is beyond the scope of discovery. Additionally, this request is overly broad and unduly burdensome.**

7. Please state in detail the transactions and/or any and all agreements relating to Your acquisition of the rights to collect upon the subject debt, and specify all documents and the date of such documents relating to such transactions.

**RESPONSE:**

**Objection. This request does not relate to any claim or defense. Without waiving objections, Defendant has an agreement with each creditor to service that creditor's accounts.**

8. Please list any and all agreements, assignments, and/or insurance policies that You have in place either to indemnify/insure or be indemnified/insured for Your activities relating to Plaintiff, including but not limited to all agreements by and between You and the original creditor(s) relating to the instant matter.

**RESPONSE:**

**None.**

9. Identify all written correspondences, including emails, You have sent to and/or received from the Plaintiff during the relevant time period. For each written correspondence, please list the date and the content of the written correspondence.

**RESPONSE:**

**Defendant received a money order from Plaintiff for a payment. Defendant has no record of receiving other written correspondence from Plaintiff. Defendant does not have copies of the actual written correspondence it sent to Plaintiff: Plaintiff has the originals. Defendant has requested to inspect those originals and will update and reconsider its response upon such inspection.**

10. State the name, title or position, address and phone number of each and every witness that Defendant plans to call to testify at trial in this case and state the substance of the testimony expected from each witness.

**RESPONSE:**

**Corporate representative from Renkim to testify about the correspondence that was sent to Plaintiff.**

**Derek Blue, account representative at Renkim Corporation, 13333 Allen Road, Southgate, Michigan 48195.**

11. Identify all emails, collection records, data records, statements, phone recordings, oral communications, or any other form of data related to the collection efforts Defendant engaged in regarding Plaintiff during the relevant time period.

**RESPONSE:**

**Defendant has a number of emails with its counsel in this case which were created after this litigation commenced. Those emails are confidential communications between Defendant and its attorneys and are withheld on that basis. Defendant also has an email to Cristen Balk at Allstar Disposal requesting details of Plaintiff's account. That email was sent at the request of Defendant's counsel, and thus, is subject to work product protections. It is being withheld on that basis**

**Without waiving objection, see account notes produced with Defendant's Rule 34 responses.**

12. Identify any and all third parties that were responsible for creating, or otherwise had input over the content, form or nature of the collection letters you sent to Plaintiff during the relevant time period.

**RESPONSE:**

**Renkim Corporation**

**Nancy Quiroga, Client Services Manager  
Amy Pfeiffer, Collection Manager  
Finance System of Toledo, Inc.  
PO Box 351297  
Toledo, Ohio 43537-1297**

14. Identify any system, computer software, application, or other form of technology used by You or any third parties to generate the collection letters You sent to Plaintiff.

**RESPONSE:**

**Collect One, from CDS Software.**

15. Explain the basis for any claim that any violation alleged in the complaint was unintentional and resulted from a bona fide error notwithstanding the maintenance of procedures reasonably adapted to avoid such error. Identify what procedures are maintained and how they are adapted to avoid the matters complained of.

**RESPONSE:**

**Defendant is not claiming to have made an error.**

16. State all actions taken by You to verify the accuracy and completeness of any records provided to You by the original creditor(s) of the subject debt(s) upon which You were collecting or attempting to collect when communicating with Plaintiff.

**RESPONSE:**

**Objection. Plaintiff has not disputed the records of the original creditors. This request is not related to any claim or defense but is beyond the scope of discovery.**

17. Describe all collection activities, which You were authorized to perform by the original creditor(s), and identify the terms of the agreement between the original creditor(s) and You pursuant to which You sought to collect the subject debt(s).

**RESPONSE:**

**Objection. This request is not related to any claim or defense but is beyond the scope of discovery.**

18. For each person who has had any involvement in any manner in any efforts on Your behalf to collect or attempt to collect any debt(s) purported owed by Plaintiff, state his/her name, position, work address, and telephone numbers, and the nature and purpose of his/her involvement.

**RESPONSE:**

**Objection. This request is overly broad and unduly burdensome. The only claim in this case is limited to the application of the FDCPA to the words on the January 15, 2018 letter.**

**Without waiving objection, the following persons are employees of Defendant who had involvement with Plaintiff's accounts.**

Heather Pottker, Collector (“HTP”), Collector  
Sierra Dupuis (“SRD”), Collector  
Nancy Quiroga (“NJQ”), Client Service Manager  
Beverly Eastman (“BAE”), Payment Poster  
Dana Miller (“DMM”), Collector  
Amy Pfeiffer (“AEW”), Collection Manager  
Emily Parker (“EKP”), Collector  
Susan Poiry (“SJP”), Clerical  
Louise Stricker (“LAS”), Clerical  
Anita Mendoza (“ANM”), Clerical  
Mary Humpert (“MEH”), Clerical  
Katie Stayancho (“KPS”), Collector

**Shelly Duncan (“SBD”), Collector  
Mary Squire (“MJS”) Collector  
Kathy Miller (“KMM”) Clerical  
Danelle Zemenski (“DAD”), Clerical  
Shana Shannon (“SBS”), Collector  
Cathy Lipkowski (“CEL”), Collector**

19. To the extent not previously done, identify all documents relevant, related to, or reflecting any aspect of any efforts undertaken by You to collect any debt(s) from Plaintiff, or to any debt(s) purportedly owed by Plaintiff to You or any original creditor(s).

**RESPONSE:**

**See Account notes marked FST1-42.**

20. Identify how the information regarding Plaintiff, including but not limited to Plaintiff's personal information and the information regarding purported debts or accounts, was inputted into the collection letters sent to Plaintiff.

**RESPONSE:**

**Plaintiff's identification information was pulled from information contained in the Collect One software system.**

21. Identify in which situations You add language mentioning interest and/or costs in Your collection letters to consumers.

**RESPONSE:**

**Letters sent to consumers who have multiple accounts might include the terms “interest”. The term “costs” is not normally used in letters, and Defendant cannot locate a letter sent to Plaintiff which included the term “costs”. Also, letters sent to consumers who have been sued by the creditor might include the terms “interest”. The term “costs” is not normally used in such letters.**

22. Identify all of the language you include regarding interest and/or costs Your collection letters.

**RESPONSE:**

**Every letter is unique in its exact content and wording. Plaintiff has the letters sent to him. See January 15, 2018 letter disclosed by Plaintiff in discovery and quoted in the complaint.**

**VERIFICATION OF INTERROGATORY RESPONSES**

I verify that the foregoing responses to Interrogatories are true and correct to the best of my knowledge and the information available to me.

---

Signed in my presence:

---

NOTARY PUBLIC

My Commission Expires\_\_\_\_\_

**REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS**

Defendant is required to produce for inspection and copying all of the following categories of documents to Plaintiff's counsel:

1. Any and all documents (including electronically stored information ("ESI") and tangible things relating to the claims or defenses in this action.

**RESPONSE:**

**Please see documents attached hereto, which have been bates-stamped as FST1-42.**

2. Any and all documents (including ESI) and tangible things required to be disclosed pursuant to Federal Rule of Civil Procedure 26(a)(1)(A).

**RESPONSE:**

**Please see documents attached hereto, which have been bates-stamped as FST1-42.**

3. Any and all records concerning Plaintiff.

**RESPONSE:**

**Objection. This request calls for information generally "concerning Plaintiff" without any indication that it is seeking relevant information. FST objects to the extent that FST has information "concerning Plaintiff" that is irrelevant to the claims and defenses in this case. Without waiving these objections, please see documents attached hereto, which have been bates-stamped as FST1-42.**

4. All of Your account notes regarding Plaintiff.

**RESPONSE:**

**Objection. This request calls for information generally "regarding Plaintiff" without any indication that it is seeking relevant information. FST objects to the extent that FST has information "concerning Plaintiff" that is irrelevant to the claims and defenses in this case. Without waiving these objections, please see documents attached hereto, which have been bates-stamped as FST 10-17 (payment records) and 18-42 (internal account notes).**

5. Any written correspondence(s) mailed, including email, to Plaintiff during the relevant time period.

**RESPONSE:**

**Objection. Plaintiff is in possession of the original correspondence in this case. Defendant does not have copies of the actual written correspondence it sent to Plaintiff. Defendant has requested to inspect those originals and will update and reconsider its response upon such inspection.**

6. Please provide all emails, voicemails, collection records, data records, statements, telephone recordings, or any other form of data related to Plaintiff.

**RESPONSE:**

**Objection. This request calls for information generally “related to Plaintiff” without any indication that it is seeking relevant information. FST objects to the extent that FST has information “concerning Plaintiff” that is irrelevant to the claims and defenses in this case. An audio recording between Plaintiff and Defendant exists, but it is irrelevant to the remaining claim alleged in the complaint. Without waiving these objections, please see documents attached hereto, which have been bates-stamped as FST1-42.**

7. All documents regarding how You determine the layout of Your collection letters.

**RESPONSE:**

**Objection. This request calls for information that is overly broad and unduly burdensome. Additionally, it potentially requests information that is subject to attorney-client privilege or includes attorney work product. Finally, this request calls for information that is beyond the scope of discovery, as some of the requested documents may relate to correspondence that was never sent to Plaintiff in this case and thus, the documents requested would be irrelevant to the claims and defenses in this case.**

8. All manuals, memoranda, instructions, and other documents that discuss, describe, or set forth standards, criteria, guidelines, policies, or practices relating to compliance with the Fair Debt Collection Practices Act (“FDCPA”).

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.**

9. Any and all documented data retention policies and a description of the data retention policies actually in place.

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.**

10. Copies of each and every exhibit, known at this time, that You will seek to introduce into evidence at trial.

**RESPONSE:**

**Objection. This request is premature. FST will provide this information in accordance with any Court Orders and the Federal Rules of Civil Procedures.**

11. Copies of the operation manual(s) for all systems and/or technology employed by You or any third parties to create the collection letters You sent to Plaintiff during the relevant time period.

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.**

12. All court orders in which you have been found to have violated the Fair Debt Collection Practices Act (“FDCPA”).

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case. Additionally, this request is overly broad and unduly burdensome and is for the purpose of harassing FST.**

13. The complete file, including but not limited to computer information, for all of the collection efforts engaged in towards Plaintiff.

**RESPONSE:**

**Objection. This request calls for information generally regarding “Plaintiff” without any indication that it is seeking relevant information. FST objects to**

**the extent that FST has information about “Plaintiff” that is irrelevant to the claims and defenses in this case. Additionally, the Federal Rules of Civil Procedure require that requests for production of documents “describe with reasonable particularity each line or category to be inspected” and the general statement for the “complete file” does not meet this standard.**

**Without waiving these objections, please see documents attached hereto, which have been bates-stamped as FST1-42.**

14. Please provide all documents relating to the technology employed by Your collections department to send the collection letters to Plaintiff.

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.**

15. Please provide Your internal procedures or manual(s) relating to Your debt collection activities.

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.**

16. Please provide all documents relating to the technology employed by Your collections department to create the collection letters You sent to Plaintiff.

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.**

17. Any and all documents pertaining to Your policies and procedures as to past due accounts, including any attempts to collect debts, collection of monies and/or debts and/or past due accounts.

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.**

18. Any and all communications by and between You and the original creditor(s) relating to Plaintiff's account(s), including but not limited to any original creditor(s) agreement to hire or otherwise turn the subject debt(s) over to You for collection, and any communications regarding that agreement and communications concerning Plaintiff.

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.**

19. Any and all agreements, assignments, and/or insurance policies that You have in place either to indemnify/insure or be indemnified/insured for Your activities relating to Plaintiff, including but not limited to all agreements between You and the original creditor(s) relating to the instant matter.

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case.**

20. Any and all documents or statements outlining or explaining the creation of the \$197.00 in "fees" as referenced in the collection letter sent regarding account number [REDACTED] 850.

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case. The "\$197" "fee" is not in the one letter at issue in this case.**

21. All documents explaining or outlining the calculation of interest charges on the debts upon which you were attempting to collect when sending Plaintiff the collection letters referenced in his Complaint.

**RESPONSE:**

**Defendant did not calculate interest on the one letter at issue in this case.**

22. Any and all documents which explain any codes, symbols, keys, phrases, and/or shorthand notations which are contained within Your records and/or account notes.

**RESPONSE:**

**Objection. This request requires FST to create documents. The Federal Rules of Civil Procedure do not contemplate the creation of documents in response to a discovery request and this is improper.**

23. Please provide any and all documents outlining or addressing Your policies and procedures as they relate to the addition of interest and fees to the principal balance of debts which have been turned over to You for collection.

**RESPONSE:**

**Objection. This request calls for information that is beyond the scope of discovery in this case, as it does not relate to the claims and defenses in this case. Defendant did not calculate interest on the one letter at issue in this case.**

Respectfully submitted,

/s/Boyd W. Gentry  
Boyd W. Gentry (0071057)  
Zachary P. Elliott (0090057)  
Law Office of Boyd W. Gentry, LLC  
4031 Colonel Glenn Highway, First Floor  
Beavercreek, OH 45431  
Tel. (937) 839-2881  
Fax (800) 839-5843  
[bgentry@boydgentrylaw.com](mailto:bgentry@boydgentrylaw.com)  
[zelliott@boydgentrylaw.com](mailto:zelliott@boydgentrylaw.com)  
*Counsel for Finance System of Toledo, Inc.*

James S. Nowak (0012890)  
4808 N. Summit St.  
Toledo, Ohio 43611  
Phone: (419) 726-2605  
Fax: (419) 726-1549  
*Attorney for Finance System of Toledo, Inc.*

**Certificate of Service**

I certify that the foregoing has been served via e-mail and regular mail to all counsel of record, as indicated below, on September 20, 2019.

Nathan C. Volheim  
Taxiarchis Hatzidimitriadis  
Sulaiman Law Group, Ltd.  
2500 South Highland Ave., Suite 200  
Lombard, Illinois 60148  
nvolheim@sulaimanlaw.com  
thatz@sulainmanlaw.com

/s/Boyd W. Gentry  
Boyd W. Gentry (0071057)

# Exhibit F

Def. FST Produced Account  
Notes for Clt. Epno Toledo  
Hospital ER Physician

ALEDFWKC 12/03/18 14:02:21 Print Debtor Work Card

PAGE 1

Clt EPNO INC TOLEDO HOSP ER PHYS

Ac# FSTI 018581 9546

Rf# [REDACTED] 3400

Nm1 GASTON,ROBIE  
 Nm2  
 Adr 6543 SOUTH AVE  
 HOLLAND, OH 43528-0000  
 PhN 419-891-8381

Desk	014	Sts	PIF	Assignnd	66.37
Assigned		07/23/13	PrincDue		.00
L/Charge		12/25/12	In	.00 %	.00
L/Paymnt			Attorney		.00
L/Letter		09/30/13	Court		.00
L/Worked		11/26/18	Other		.00
L/Trust		10/24/17	JudInt		.00
N/Review			Misc		.00
			CntgcyFe		.00
			Tot Due		.00
			Tot Paid		66.37

Msg

## ----- HISTORY -----

Date	Time	Uid	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
07/23/13	16:01		New Assignment		Y	014	08/22	1	07/23 HSE
07/23/13	21:02		CDS Ltr to 01 FIRST LETTER		Y	014	08/22	001	2 08/23 HSE
08/23/13	21:03		CDS Ltr to 01 JUNK LETTER		Y	014	08/23	JNK	3 08/23 HSE
08/23/13	21:03		CDS Ltr/Ser Completed		Y	014	08/23		HSE
08/23/13	21:03		CDS Sts Chg:HSE To NEW		Y	014	08/23		NEW
08/23/13	21:03		CDS NEW BUSINESS		Y	014	08/24		NEW
09/20/13	12:18		HTP Sts Chg:NEW To DLS		Y	014	08/24		DLS
09/20/13	12:18		HTP CALED PHN 1 - NO ANSWER		Y	014	10/04		DLS
09/20/13	12:18		HTP DEMAND LETTER SENT		Y	014	10/04		DLS
09/20/13	12:18		HTP Ltr to 01 DEMAND LETTER	SNT	Y	014	10/04	002	DLS
09/26/13	14:02		LAS Sts Chg:DLS To PYR		Y	014	10/04		PYR
09/26/13	14:02		LAS PAYMENT RECEIVED		Y	014	09/27		PYR
09/30/13	10:21		HTP Sts Chg:PYR To SBL		Y	014	09/27		SBL
09/30/13	10:21		HTP SMALL BALANCE LTR		Y	014	10/14		SBL
09/30/13	10:21		HTP Ltr to 01 SMALL BALANCE LETT	SNT	Y	014	10/14	005	SBL
03/09/15	14:28		BAE Sts Chg:SBL To PYR		Y	014	10/14		PYR
03/09/15	14:28		BAE PAYMENT RECEIVED		Y	014	03/10		PYR
03/10/15	12:43		HTP Sts Chg:PYR To CTC		Y	014	03/10		CTC
03/10/15	12:43		HTP Dsk Chg:014 To 015		Y	015	03/10		CTC
03/10/15	12:43		HTP COLLECTOR TO COLLECTOR		Y	015	03/11		CTC
			SPS TO RACHEL?						
03/11/15	16:40		EKP Account Tied		Y	015	03/11		CTC
03/13/15	11:24		EKP Sts Chg:CTC To PTP		Y	015			PTP
03/13/15	11:24		EKP Tie Change		Y	015			PTP
09/22/15	08:32		EKP Sts Chg:PTP To BRK		Y	015			BRK
09/22/15	08:32		EKP Tie Change		Y	015			BRK
09/23/15	16:58		EKP Sts Chg:BRK To LTR		Y	015			LTR
09/23/15	16:58		EKP Tie Change		Y	015			LTR
10/08/15	08:41		EKP Sts Chg:LTR To PTP		Y	015			PTP
10/08/15	08:41		EKP Tie Change		Y	015			PTP
06/08/16	11:54		EKP Sts Chg:PTP To PAT		Y	015			PAT
06/08/16	11:54		EKP Tie Change		Y	015			PAT
12/28/16	13:34		EKP Sts Chg:PAT To LGR		Y	015			LGR
12/28/16	13:34		EKP Tie Change		Y	015			LGR
12/28/16	13:36		EKP Sts Chg:LGR To PAT		Y	015			PAT
12/28/16	13:36		EKP Tie Change		Y	015			PAT
01/26/17	13:55		EKP Sts Chg:PAT To LGR		Y	015			LGR

ALEDFWKC 12/03/18 14:02:21 Print Debtor Work Card	PAGE	2
01/26/17 13:55 EKP Dsk Chg:015 To LG1 Y LG1	LGR	
01/26/17 13:55 EKP Tie Change Y LG1	LGR	
06/13/17 13:36 HTP Account Untied Y LG1	LGR	
UNTIED FROM HEADER: [REDACTED] 732 GASTON, RACHEL		
08/31/11 13:59 MJS CALLED PHN 1-LEFT MSGE ON A/M Y 017 09/14	DLS	
08/31/11 13:59 MJS DEMAND LETTER SENT Y 017 09/14	DLS	
08/31/11 13:59 MJS Ltr to 01 DEMAND LETTER TIED SNT Y 017 09/14 T02	DLS	
09/14/11 12:25 MJS CALLED PHN 1-LEFT MSGE ON A/M Y 017 10/14	LLS	
09/14/11 12:25 MJS LAST LTR SENT TO DTR Y 017 10/14	LLS	
09/14/11 12:25 MJS Ltr to 01 LAST LETTER TIED SNT Y 017 10/14 T04	LLS	
12/01/11 13:33 MJS ADDITIONAL REMARK Y 017 12/01	LLS	
***LOOKS LIKE THIS D WORKS FOR THE SHERIFFS OFFICE. PER COUNTY EMPLOYEE SIGHT.		
12/01/11 13:34 MJS ADDITIONAL REMARK Y 017 12/01	LLS	
CORRECTION CENTER.		
12/01/11 13:37 MJS ADDITIONAL REMARK Y 017 12/01	LLS	
CALLED POE AND WAS TRANFERED TO D. THEY STATED THAT SHE COMES IN AFTER 4		
12/01/11 13:37 MJS ACT/PENDING REVIEW Y 017 12/01	RVW	
12/02/11 08:25 MJS ADDITIONAL REMARK Y 017 12/02	RVW	
12/02/11 16:08 MJS ACT/PENDING REVIEW Y 017 12/02	RVW	
CALLED POE AND NO ANSW.		
03/28/12 19:46 SBD CALLED PHN 1-LEFT MSGE ON A/M Y 006 04/27	LGR	
ADDED PHONE FROM TRAILER HAS LEGAL THAT IS NOT YET PAYING		
03/28/12 19:46 SBD CALLED PHN2 - LFT MSGE ON A/M Y 006 04/27	LGR	
03/28/12 19:46 SBD LEGAL REVIEW Y 006 04/27	LGR	
03/28/12 19:46 SBD GOOGLED DEBTOR Y 006 04/27	LGR	
05/30/12 13:48 SBD LEGAL REVIEW Y 006 06/29	LGR	
05/30/12 13:49 SBD ADDITIONAL REMARK Y 006 06/29	LGR	
NO NEW INFO		
07/20/12 10:00 SBD ACT/PENDING REVIEW Y 006 07/20	RVW	
NOTHING ON LEGAL		
02/11/13 16:50 KPS CALED PHN 1 - NO ANSWER Y 010 02/11	RVW	
D ALREADY HAS LEGAL THAT HASN'Y RECEIVED ANYTHING BNUT A \$10 PYMT SO FAR. THESE BILLS HAVE RCV'D FIRST AND LAST LETTERS.		
02/11/13 16:50 KPS TEL BUSY Y 010 02/11	RVW	
02/11/13 16:50 KPS ACT/PENDING REVIEW Y 010 02/11	RVW	
03/14/13 09:04 AEW LEGAL COLLECTOR REVIEW Y 010 03/15	LRV	
03/29/13 13:40 KPS LEGAL REVIEW Y 010 04/28	LGR	
NOT SENDING OUT ANY OTHER LTRS ON THIS UNTIL OTHER CURRENT LEGAL STARTS GETTING PAID OFF SOME MORE.		
06/14/13 09:24 KPS LEGAL REVIEW Y 010 07/14	LGR	
STILL NO MOVEMENT ON LEGAL CASE. JUST STICKING THIS BACK IN LGR		
06/14/13 15:29 AEW ADDITIONAL REMARK Y 010 07/14	LGR	
IF NO UPDATES ON H 5942517 BY AUGUST LET ME KNOW AND I WILL RE-CHK WITH ATTY ON STATUS		
08/19/13 13:54 DMM TEL MADE CONTACT Y 007 10/18	LGR	
CD PH#1. SHE STATED WENT TO DOC TODAY & HASN'T BEEN RELEASED TO RETRN TO EMP. SHE GOES BCK TO DOC IN 2-3WKS TO BE RE-ASSESSED. IS ON MED LEAVE. ADVSD I WILL CB 2MOS TO SEE IF SHE'S RETRND TO EMP & SEE ABT P/A		
08/19/13 13:54 DMM LEGAL REVIEW Y 007 10/18	LGR	
10/18/13 09:44 DMM LEGAL REVIEW Y 007 11/17	LGR	

ALEDFWKC 12/03/18 14:02:21 Print Debtor Work Card PAGE 3

STILL, X PYMNTS ON LEGAL

02/04/14 11:51 EKP CALLED PHN 1-LEFT MSGE ON A/M Y 015 03/06 ALS  
SENDING NEW ALS FOR PAT

02/04/14 11:51 EKP ATTY LTR SENT TO DTR Y 015 03/06 ALS

02/04/14 11:52 EKP ATTY LTR SENT TO DTR Y 015 03/06 ALS

02/04/14 11:52 EKP Ltr to 01 BIESIADA ATTY LETT SNT Y 015 03/06 027 PAT

02/04/14 11:52 EKP POSSIBLE ASSET FOR LEGAL Y 015 02/18 CTC

03/10/14 15:43 CEL COLLECTOR TO COLLECTOR Y 015 03/11 CTC  
ADDED THREE NEW TRAILERS-cel

03/11/14 09:46 EKP POSSIBLE ASSET FOR LEGAL Y 015 03/25 PAT

03/11/14 13:03 EKP PMT PLAN STARTED Y 015 03/25 PAY  
WANTS TO DO 40/EOM. WILL CALL IN ON THE 28TH TO DO OVER PH. CONFIRMED  
AD AND WILL AND EXPLAINED ARRANG LETTER GOING OUT WITH UPDATED  
BALANCE. ADVISED THAT ONCE SHE IS WORKING FT AGAIN SHE NEEDS TO UP  
THESE PAYMENTS SINCE IT WILL CURRENTLY TAKE HER A LONG TIME TO PAY  
OFF.

THIS ACTION SENDS A T06 AUTOMATICALLY

03/11/14 13:03 EKP Ltr to 01 PAYMENT PLAN LETTE SNT Y 015 03/25 T06 PAY

03/11/14 13:03 EKP PAYMENT PLAN START UP Y 015 PAY

03/11/14 14:33 LAS ADDITIONAL REMARK Y 015 PAY  
RECD CK#3005 FOR \$20.00-NOTHING IN IT WINDOW/OK TO APPLY PMT

03/18/14 21:00 CDS Pymnt Plan Reminder Y 015 JNK PAY

03/26/14 15:32 DMM HOLD VIRTUAL CHECK PAYMENTS N PAY 03/26 HVC  
DC TO MAKE \$40 CHCK PYMNT FOR MARCH.

03/27/14 11:00 MEH PAYMENT RECEIVED N 015 03/28 PYR

03/27/14 11:40 MEH ADDITIONAL REMARK N 015 03/28 PYR

03/27/14 11:40 MEH Ltr to 01 TIE RECEIPT CHECK SNT N 015 03/28 RCP PAY

04/07/14 09:36 EKP PAYMENT PLAN START UP N 015 PAY

05/05/14 11:30 EKP ADDITIONAL REMARK N 015 07/30 PAY

06/04/14 19:33 EKP PAYMENT PLAN START UP N 015 PAY

06/04/14 19:33 EKP Promise PTP 40.00 On 072514 N 015 07/25 PTP

07/02/14 14:36 LAS PAYMENT RECEIVED N 015 07/03 PTP

07/07/14 08:41 EKP Promise PTP 40.00 On 072514 N 015 07/25 PTP

07/30/14 21:00 CDS BROKEN PROMISE N 015 07/31 BRK  
#ST="PTP" #LW="151033" #RV="000000"

08/04/14 12:17 LAS PAYMENT RECEIVED N 015 08/05 PYR

08/06/14 19:11 EKP Promise PTP 40.00 On 091514 N 015 09/15 PTP

09/09/14 14:45 LAS PAYMENT RECEIVED N 015 09/10 PYR

09/11/14 13:02 EKP Promise PTP 40.00 On 100914 N 015 10/09 PTP

09/30/14 11:32 LAS PAYMENT RECEIVED N 015 10/01 PYR

10/06/14 09:15 EKP Promise PTP 40.00 On 113014 N 015 11/30 PTP

10/31/14 13:39 LAS PAYMENT RECEIVED N 015 11/01 PYR

11/03/14 09:26 EKP Promise PTP 40.00 On 122614 N 015 12/26 PTP

12/02/14 15:50 LAS PAYMENT RECEIVED N 015 12/03 PYR

12/04/14 08:47 EKP Promise PTP 40.00 On 013115 N 015 01/31 PTP

01/07/15 12:08 ANM PAYMENT RECEIVED N 015 01/08 PYR

01/08/15 16:07 EKP Promise PTP 40.00 On 022815 N 015 02/28 PTP

02/04/15 10:40 ANM PAYMENT RECEIVED N 015 02/05 PYR

02/05/15 09:01 EKP Promise PTP 40.00 On 042415 N 015 04/24 PTP

03/11/15 19:49 EKP ADDITIONAL REMARK N 015 04/24 PTP

ADDED TRL FOR SP SINCE HIS INFO IS ON THE BANKING PMT INFO WE  
RECIEVED. ALSO THE AD ON CHECK IS DIFF FROM HEADER THAT WAS VERIFIED  
PREV SO JUST ADDED TO SEQ2 FOR SP.

ALEDFWKC	12/03/18	14:02:21	Print Debtor Work Card	PAGE	4
03/12/15	10:26	LAS PAYMENT RECEIVED	N	015 03/13	PYR
03/13/15	11:24	EKP Promise PTP 40.00 On 043015	N	015 04/30	PTP
04/03/15	09:51	LAS PAYMENT RECEIVED	N	015 04/04	PYR
04/06/15	13:52	EKP Promise PTP 40.00 On 063015	N	015 06/30	PTP
05/06/15	12:04	BAE PAYMENT RECEIVED	N	015 05/07	PYR
05/07/15	14:41	EKP ADDITIONAL REMARK PTP ALREADY SET	N	015 06/30	PTP
06/03/15	10:26	BAE PAYMENT RECEIVED	N	015 06/04	PYR
06/04/15	09:38	EKP Promise PTP 40.00 On 083015	N	015 08/30	PTP
07/08/15	10:50	BAE PAYMENT RECEIVED	N	015 07/09	PYR
07/09/15	08:52	EKP ADDITIONAL REMARK	N	015 08/30	PYR
08/05/15	15:22	BAE PAYMENT RECEIVED	N	015 08/06	PYR
08/06/15	14:51	EKP Promise PTP 40.00 On 093015	N	015 09/30	PTP
09/04/15	16:28	BAE PAYMENT RECEIVED	N	015 09/05	PYR
09/09/15	11:52	EKP Promise PTP 40.00 On 113015	N	015 11/30	PTP
09/21/15	11:54	SJP Action Taken NSF FROM TRUST POSTING DEBTOR:0008254571	N	015 09/22	NSF
09/21/15	11:54	SJP Action Taken NSF FROM TRUST POSTING DEBTOR:0008254572	N	015 09/22	NSF
09/21/15	11:56	SJP ADDITIONAL REMARK NSF - VCK DATED 9/1/15 FOR \$40 NOT SUFFICIENT FUNDS + \$45 FST/BANK FEE , FEE IS ON TRL # 8254571	N	015 09/22	NSF
09/22/15	08:31	EKP BROKEN PROMISE	N	015 09/23	BRK
09/23/15	16:58	EKP DTR LTR REQUESTED	Y	015 10/13	LTR
09/23/15	16:58	EKP Ltr to 01 FIRST BROKEN PROMI SNT	Y	015 10/13 T08	LTR
10/07/15	14:46	BAE PAYMENT RECEIVED	Y	015 10/08	PYR
10/07/15	14:59	BAE ADDITIONAL REMARK RECD ONLN CK# 0000005233 FOR \$40.00, PUT TOWARDS NSF FEE	Y	015 10/08	PYR
10/08/15	08:41	EKP ADDITIONAL REMARK D MADE UP PMT FOR SEPT- STILL HAS NSF FEE TO PAY BUT NEXT PMT NOT DUE TIL NOV	Y	015 11/30	PTP
11/04/15	13:34	BAE PAYMENT RECEIVED	Y	015 11/05	PYR
11/04/15	19:23	EKP Promise PTP 40.00 On 013016	Y	015 01/30	PTP
12/04/15	13:17	BAE PAYMENT RECEIVED	Y	015 12/05	PYR
12/04/15	16:41	EKP ADDITIONAL REMARK D SENT IN ANOTHER PMT	Y	015 01/30	PTP
12/21/15	14:05	EKP ADDITIONAL REMARK SEV NEW TRLS ADDED	Y	015 01/30	PTP
01/06/16	11:57	BAE PAYMENT RECEIVED	Y	015 01/07	PYR
01/06/16	18:28	EKP Promise PTP 40.00 On 022916	Y	015 02/29	PTP
01/27/16	14:50	EKP ADDITIONAL REMARK NEW TRL SAME INFO	Y	015 02/29	PTP
02/05/16	09:45	BAE PAYMENT RECEIVED	Y	015 02/06	PYR
02/08/16	11:26	EKP Promise PTP 40.00 On 032916	Y	015 03/29	PTP
03/04/16	16:14	BAE PAYMENT RECEIVED	Y	015 03/05	PYR
03/08/16	09:12	EKP Promise PTP 40.00 On 052916	Y	015 05/29	PTP
04/12/16	11:14	EKP ADDITIONAL REMARK SEV NEW TRLS ADDED	Y	015 05/29	PTP
05/13/16	09:05	EKP ADDITIONAL REMARK SEV NEW TRLS ADDED- WILL SEND NEW PPL AFTER NEXT PMT COMES IN	Y	015 05/29	PTP
06/03/16	21:00	CDS BROKEN PROMISE #ST="PTP" #LW="151709" #RV="151725"	Y	015 06/04	BRK
		06/08/16 11:54 EKP POSSIBLE ASSET FOR LEGAL	Y	015 06/22	PAT

ALEDFWKC	12/03/18	14:02:21	Print Debtor Work Card	PAGE	5
06/08/16	11:54	EKP Ltr to 01 FIRST BROKEN PROMI SNT Y	015 06/22 T08	PAT	
06/22/16	13:34	EKP POSSIBLE ASSET FOR LEGAL	Y 015 07/06	PAT	
07/06/16	16:45	EKP POSSIBLE ASSET FOR LEGAL	Y 015 07/20	PAT	
07/06/16	16:45	EKP Ltr to 01 BIESIADA ATTY LETT SNT Y	015 07/20 027	PAT	
07/13/16	14:36	EKP ADDITIONAL REMARK	Y 015 07/20	PAT	
RECEIVED CALL FROM GALLON AND TACKUS- REP HER ON TRL 8507485					
07/28/16	08:47	EKP POSSIBLE ASSET FOR LEGAL	Y 015 08/11	PAT	
08/01/16	08:25	EKP ADDITIONAL REMARK	Y 015 08/11	PYR	
D MADE PMT TO K					
08/01/16	08:26	EKP PAYMENT PLAN START UP	Y 015	PAY	
08/22/16	07:53	FST Pymnt Plan Reminder	Y 015 JNK	PAY	
09/06/16	07:35	NJQ BROKEN PAYMENT PLAN #ST="PAY" #LW="151789" #RV="151826"	Y 015 09/07	BRP	
09/07/16	11:29	EKP POSSIBLE ASSET FOR LEGAL	Y 015 09/21	PAT	
09/23/16	10:37	EKP PAYMENT PLAN START UP	Y 015	PAY	
09/23/16	21:02	CDS Pymnt Plan Reminder	Y 015 JNK	PAY	
10/06/16	21:00	CDS BROKEN PAYMENT PLAN #ST="PAY" #LW="151826" #RV="151856"	Y 015 10/07	BRP	
10/07/16	09:21	EKP ADDITIONAL REMARK	Y 015 11/07	BRP	
10/07/16	09:21	EKP Ltr to 01 FIRST BROKEN PROMI SNT Y	015 11/07 T08	BRP	
11/08/16	16:53	EKP POSSIBLE ASSET FOR LEGAL	Y 015 11/22	PAT	
BACK IN PAT ROTATION- NO PMT MADE					
11/25/16	14:39	EKP POSSIBLE ASSET FOR LEGAL	Y 015 12/25	PAT	
12/28/16	13:34	EKP LEGAL REVIEW	Y 015 01/27	LGR	
12/28/16	13:36	EKP POSSIBLE ASSET FOR LEGAL	Y 015 01/21	PAT	
NO PMTS MADE SINCE JULY. REMOVED PIF TRLS. ADDED IN NEW HSE. WILL SEND LEGAL NEXT MO.					
01/26/17	13:54	EKP LEGAL REVIEW	Y LG1 02/25	LGR	
01/26/17	13:54	EKP Ltr to 01 EMPLOYER LETTER - SNT Y	LG1 02/25 T03	LGR	
06/13/17	13:38	HTP Dsk Chg:LG1 To 014	Y 014 06/13	LGR	
06/13/17	13:38	HTP Dsk Chg:LG1 To 014	Y 014 06/13	LGR	
06/14/17	09:57	HTP Sts Chg:LGR To DLS	Y 014	DLS	
06/14/17	09:57	HTP Tie Change	Y 014	DLS	
07/18/17	17:07	HTP Sts Chg:DLS To ALS	Y 014	ALS	
07/18/17	17:07	HTP Tie Change	Y 014	ALS	
10/24/17	11:29	BAE Sts Chg:ALS To PYR	Y 014	PYR	
10/24/17	11:29	BAE Action Taken	Y 014	PYR	
Applied Desk/Status/Priority/Credit Reporting Flag Changes from tied account 0009002260					
10/24/17	15:02	BAE Sts Chg:PYR To PIF	Y 014	PIF	
10/26/17	12:15	SJP CRDT BUR REPORT PIF #PR="1" #TF="Y" #T1="Y" #LW="151279"	Y 014	PIF	
02/23/18	09:49	SJP CRDT BUR REPORT PIF #PR="R" #TF="Y" #T1="Y" #LW="152240"	Y 014	PIF	
03/20/18	17:34	SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152360"	Y 014	PIF	
04/24/18	12:13	SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152385"	Y 014	PIF	
04/24/18	18:30	SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152420"	Y 014	PIF	
05/09/18	12:23	DMM Account Untied Untied from Header: [REDACTED] 2260 TRAILER: [REDACTED] 546 GASTON, ROBIE	Y 014	PIF	
05/22/18	11:10	SJP CRDT BUR REPORT PIF	Y 014	PIF	

ALEDFWKC 12/03/18 14:02:21 Print Debtor Work Card PAGE 6  
 #TCC=" "T1="Y" #LW="152420"  
 06/21/18 19:35 SJP CRDT BUR REPORT PIF Y 014 PIF  
 #TCC=" "T1="Y" #LW="152448"  
 07/23/18 18:13 SJP CRDT BUR REPORT PIF Y 014 PIF  
 #TCC=" "T1="Y" #LW="152478"  
 08/21/18 12:02 SJP CRDT BUR REPORT PIF Y 014 PIF  
 #TCC=" "T1="Y" #LW="152510"  
 09/19/18 17:21 SJP CRDT BUR REPORT PIF Y 014 PIF  
 #TCC=" "T1="Y" #LW="152539"  
 10/23/18 15:56 SJP CRDT BUR REPORT PIF Y 014 PIF  
 #TCC=" "T1="Y" #LW="152568"  
 11/26/18 18:45 SJP CRDT BUR REPORT PIF Y 014 PIF  
 #TCC=" "T1="Y" #LW="152602"

## ----- TRUST HISTORY -----

Date	Batch	UID	DSK	TCD	Description	Amount	Comm	NewBlnc
09/26/13	065059	LAS	039	002	PRIN PMT TO CLIENT	20.00	4.40	46.37
08/28/17	999998	BAE	014	001	PRIN PMT TO AGENCY	41.14	9.05	5.23
10/24/17	079518	BAE	014	001	PRIN PMT TO AGENCY	5.23	1.15	.00

\*\* End of Report \*\*

# Exhibit G

Def. FST Produced Account  
Notes for Clt Allstar Disposal  
and Recycling

SIP  
notes from

ALEDFWKC 12/03/18 14:04:25 Print Debtor Work Card  
Clt ALLSTAR DISPOSAL AND RECYCLING

PAGE 1  
Ac# FSTI 001669 3419

Rf#

Nm1 GASTON, ROBIE	Desk	014	Sts	SIF	Assignnd	157.00
Nm2	Assigned		05/18/15	PrincDue		.00
Adr 6543 SOUTH	L/Charge		11/11/14	In .00 %		.00
HOLLAND, OH 43528	L/Paymnt			Attorney		.00
PhN 419-819-8381	L/Letter		05/18/15	Court		.00
	L/Worked		11/26/18	Other		.00
	L/Trust		07/27/17	JudInt		.00
	N/Review			Misc		.00
Msg				CntgcyFe		.00
				Tot Due		.00
				Tot Paid		100.00

----- HISTORY -----

Date	Time	Uid	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
05/18/15	16:03	KMM	New Assignment	Y	019	06/17		1	05/18 HSE
05/18/15	21:00	CDS	Ltr to 01 FIRST LETTER	Y	019	06/17	001	2	06/18 HSE
05/27/15	07:51	DAD	Sts Chg:HSE To RKM	Y	019	06/18		2	06/18 RKM
05/27/15	07:51	DAD	RENKIM UPDATES Mail Return Letter# 001 Reason Returned Undeliverable	Y	019	05/28		1	06/18 RKM
05/28/15	08:34	SBS	Sts Chg:RKM To RVW	Y	019	05/28		1	06/18 RVW
05/28/15	08:34	SBS	ACT/PENDING REVIEW	Y	019	05/28			RVW
07/23/15	16:24	DAD	Sts Chg:RVW To MGR	Y	019	05/28			MGR
07/23/15	16:24	DAD	DANELLE TO COLLECTOR CLIENT SENT POSS PH# TO TRY	Y	019	07/24			MGR
07/23/15	16:24	DAD	Demographics Change Phn1 Chg: TO 4198198381 Sequence# 01	Y	019	07/24			MGR
07/28/15	08:36	SBS	Sts Chg:MGR To RVW	Y	019	07/24			RVW
07/28/15	08:36	SBS	CALLED PHN 1-LEFT MSGE ON A/M	Y	019	07/28			RVW
07/28/15	08:36	SBS	ACT/PENDING REVIEW	Y	019	07/28			RVW
06/13/17	13:38	HTP	Dsk Chg:019 To 014	Y	014	07/28			RVW
06/13/17	13:38	HTP	Dsk Chg:019 To 014	Y	014	07/28			RVW
06/14/17	09:57	HTP	Sts Chg:RVW To DLS	Y	014				DLS
06/14/17	09:57	HTP	Tie Change	Y	014				DLS
07/18/17	17:07	HTP	Sts Chg:DLS To ALS	Y	014				ALS
07/18/17	17:07	HTP	Tie Change	Y	014				ALS
07/27/17	11:46	BAE	Sts Chg:ALS To PYR	Y	014				PYR
07/27/17	11:46	BAE	PAYMENT RECEIVED	Y	014	07/28			PYR
07/27/17	12:04	BAE	Sts Chg:PYR To ADJ	Y	014	07/28			ADJ
07/27/17	12:04	BAE	ADJUSTED AMOUNT #ST="PYR" #LW="152149" #RV="152150"	Y	014	07/28			ADJ
07/27/17	12:04	BAE	Sts Chg:ADJ To SIF	Y	014	07/28			SIF
08/21/17	15:47	SJP	CRDT BUR REPORT PIF #PR="4" #TF="Y" #T1="Y" #LW="152149"	Y	014				SIF
02/23/18	08:09	SJP	CRDT BUR REPORT PIF #PR="R" #TF="Y" #T1="Y" #LW="152174"	Y	014				SIF
03/20/18	15:42	SJP	CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152360"	Y	014				SIF
04/24/18	09:22	SJP	CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152385"	Y	014				SIF
04/24/18	15:20	SJP	CRDT BUR REPORT PIF	Y	014				SIF

ALEDFWKC 12/03/18 14:04:25 Print Debtor Work Card	PAGE	2
#TCC=" "T1="Y" #LW="152420"		
05/09/18 12:23 DMM Account Untied	Y 014 05/09	SIF
Untied from Header: 0009002260 TRAILER: 0008608419 GASTON,ROBIE		
05/10/18 07:53 HTP Priority Chg:R To	Y 014 05/09	SIF
05/10/18 07:53 HTP DROP REVIEW DATE	Y 014	SIF
05/22/18 09:00 SJP CRDT BUR REPORT PIF	Y 014	SIF
#TCC=" "T1="Y" #LW="152436"		
06/21/18 16:42 SJP CRDT BUR REPORT PIF	Y 014	SIF
#TCC=" "T1="Y" #LW="152448"		
07/23/18 14:45 SJP CRDT BUR REPORT PIF	Y 014	SIF
#TCC=" "T1="Y" #LW="152478"		
08/21/18 10:02 SJP CRDT BUR REPORT PIF	Y 014	SIF
#TCC=" "T1="Y" #LW="152510"		
09/19/18 14:26 SJP CRDT BUR REPORT PIF	Y 014	SIF
#TCC=" "T1="Y" #LW="152539"		
10/23/18 13:52 SJP CRDT BUR REPORT PIF	Y 014	SIF
#TCC=" "T1="Y" #LW="152568"		
11/26/18 15:52 SJP CRDT BUR REPORT PIF	Y 014	SIF
#TCC=" "T1="Y" #LW="152602"		

----- TRUST HISTORY -----

Date	Batch	UID	DSK	TCD	Description	Amount	Comm	NewBlnc
07/27/17	078738	BAE	014	002	PRIN PMT TO CLIENT	100.00	33.33	.00
07/27/17	078738	BAE	014	033	PRIN AMT ADJ +/-	57.00-	.00	.00
07/27/17	078738	BAE	014	700	ATTY COMMISSION FEE	6.67	.00	.00

\*\* End of Report \*\*

# Exhibit H

Def. FST Produced Account  
Notes for Toledo Clinic, Inc.  
Reference No. [REDACTED] 870001

ALEDFWKC 12/03/18 14:05:29 Print Debtor Work Card PAGE 1  
 Clt TOLEDO CLINIC INC Ac# FSTI 05998 0737  
 Rf# 870001  
 Nm1 GASTON, ROBIE Desk 014 Sts PIF Assignd 69.13  
 Nm2 Assigned 06/18/16 PrincDue .00  
 Adr 6543 DORR ST APT 43 L/Charge 01/14/15 In .00 % .00  
 TOLEDO, OH 43615-4217 L/Paymnt Attorney .00  
 PhN 419-819-8381 L/Letter 06/18/16 Court .00  
 L/Worked 11/26/18 Other .00  
 L/Trust 08/02/17 JudInt .00  
 N/Review Misc .00  
 Msg CntgcyFe .00  
 Tot Due .00  
 Tot Paid 69.13

## ----- HISTORY -----

Date	Time	Uid	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
06/18/16	09:08		New Assignment		Y	002	07/18	1	06/18 HSE
06/18/16	21:00	CDS	Ltr to 01 FIRST LETTER		Y	002	07/18	001	2 07/19 HSE
06/22/16	13:33	EKP	Dsk Chg:002 To 015		Y	015	07/19	2	07/19 HSE
06/22/16	13:33	EKP	Dsk Chg:002 To 015		Y	015	07/19	2	07/19 HSE
06/22/16	13:34	EKP	Sts Chg:HSE To PAT		Y	015			PAT
06/22/16	13:34	EKP	Tie Change		Y	015			PAT
12/28/16	13:34	EKP	Sts Chg:PAT To LGR		Y	015			LGR
12/28/16	13:34	EKP	Tie Change		Y	015			LGR
12/28/16	13:36	EKP	Sts Chg:LGR To PAT		Y	015			PAT
12/28/16	13:36	EKP	Tie Change		Y	015			PAT
01/26/17	13:55	EKP	Sts Chg:PAT To LGR		Y	015			LGR
01/26/17	13:55	EKP	Dsk Chg:015 To LG1		Y	LG1			LGR
01/26/17	13:55	EKP	Tie Change		Y	LG1			LGR
06/13/17	13:37	HTP	Account Untied		Y	LG1			LGR
UNTIED FROM HEADER: 0008039732 GASTON, RACHEL									
08/31/11	13:59	MJS	CALLED PHN 1-LEFT MSGE ON A/M		Y	017	09/14		DLS
08/31/11	13:59	MJS	DEMAND LETTER SENT		Y	017	09/14		DLS
08/31/11	13:59	MJS	Ltr to 01 DEMAND LETTER TIED SNT		Y	017	09/14	T02	DLS
09/14/11	12:25	MJS	CALLED PHN 1-LEFT MSGE ON A/M		Y	017	10/14		LLS
09/14/11	12:25	MJS	LAST LTR SENT TO DTR		Y	017	10/14		LLS
09/14/11	12:25	MJS	Ltr to 01 LAST LETTER TIED	SNT	Y	017	10/14	T04	LLS
12/01/11	13:33	MJS	ADDITIONAL REMARK		Y	017	12/01		LLS
***LOOKS LIKE THIS D WORKS FOR THE SHERIFFS OFFICE. PER COUNTY EMPLOYEE SIGHT.									
12/01/11	13:34	MJS	ADDITIONAL REMARK		Y	017	12/01		LLS
CORRECTION CENTER.									
12/01/11	13:37	MJS	ADDITIONAL REMARK		Y	017	12/01		LLS
CALLED POE AND WAS TRANFERED TO D. THEY STATED THAT SHE COMES IN AFTER									
4									
12/01/11	13:37	MJS	ACT/PENDING REVIEW		Y	017	12/01		RVW
12/02/11	08:25	MJS	ADDITIONAL REMARK		Y	017	12/02		RVW
12/02/11	16:08	MJS	ACT/PENDING REVIEW		Y	017	12/02		RVW
CALLED POE AND NO ANSW.									
03/28/12	19:46	SBD	CALLED PHN 1-LEFT MSGE ON A/M		Y	006	04/27		LGR
ADDED PHONE FROM TRAILER HAS LEGAL THAT IS NOT YET PAYING									
03/28/12	19:46	SBD	CALLED PHN2 - LFT MSGE ON A/M		Y	006	04/27		LGR
03/28/12	19:46	SBD	LEGAL REVIEW		Y	006	04/27		LGR

ALEDFWKC 12/03/18 14:05:29	Print Debtor Work Card	PAGE	2
03/28/12 19:46 SBD GOOGLED DEBTOR	Y 006 04/27	LGR	
05/30/12 13:48 SBD LEGAL REVIEW	Y 006 06/29	LGR	
05/30/12 13:49 SBD ADDITIONAL REMARK NO NEW INFO	Y 006 06/29	LGR	
07/20/12 10:00 SBD ACT/PENDING REVIEW NOTHING ON LEGAL	Y 006 07/20	RVW	
02/11/13 16:50 KPS CALED PHN 1 - NO ANSWER D ALREADY HAS LEGAL THAT HASN'Y RECEIVED ANYTHING BNUT A \$10 PYMT SO FAR. THESE BILLS HAVE RCV'D FIRST AND LAST LETTERS.	Y 010 02/11	RVW	
02/11/13 16:50 KPS TEL BUSY	Y 010 02/11	RVW	
02/11/13 16:50 KPS ACT/PENDING REVIEW	Y 010 02/11	RVW	
03/14/13 09:04 AEW LEGAL COLLECTOR REVIEW	Y 010 03/15	LRV	
03/29/13 13:40 KPS LEGAL REVIEW NOT SENDING OUT ANY OTHER LTRS ON THIS UNTIL OTHER CURRENT LEGAL STARTS GETTING PAID OFF SOME MORE.	Y 010 04/28	LGR	
06/14/13 09:24 KPS LEGAL REVIEW STILL NO MOVEMENT ON LEGAL CASE. JUST STICKING THIS BACK IN LGR	Y 010 07/14	LGR	
06/14/13 15:29 AEW ADDITIONAL REMARK IF NO UPDATES ON H 5942517 BY AUGUST LET ME KNOW AND I WILL RE-CHK WITH ATTY ON STATUS	Y 010 07/14	LGR	
08/19/13 13:54 DMM TEL MADE CONTACT CD PH#1. SHE STATED WENT TO DOC TODAY & HASN'T BEEN RELEASED TO RETRN TO EMP. SHE GOES BCK TO DOC IN 2-3WKS TO BE RE-ASSESSED. IS ON MED LEAVE. ADVSD I WILL CB 2MOS TO SEE IF SHE'S RETRND TO EMP & SEE ABT P/A	Y 007 10/18	LGR	
08/19/13 13:54 DMM LEGAL REVIEW	Y 007 10/18	LGR	
10/18/13 09:44 DMM LEGAL REVIEW STILL X PYMNTS ON LEGAL	Y 007 11/17	LGR	
02/04/14 11:51 EKP CALLED PHN 1-LEFT MSGE ON A/M SENDING NEW ALS FOR PAT	Y 015 03/06	ALS	
02/04/14 11:51 EKP ATTY LTR SENT TO DTR	Y 015 03/06	ALS	
02/04/14 11:52 EKP ATTY LTR SENT TO DTR	Y 015 03/06	ALS	
02/04/14 11:52 EKP Ltr to 01 BIESIADA ATTY LETT SNT	Y 015 03/06 027	ALS	
02/04/14 11:52 EKP POSSIBLE ASSET FOR LEGAL	Y 015 02/18	PAT	
03/10/14 15:43 CEL COLLECTOR TO COLLECTOR ADDED THREE NEW TRailers-cel	Y 015 03/11	CTC	
03/11/14 09:46 EKP POSSIBLE ASSET FOR LEGAL	Y 015 03/25	PAT	
03/11/14 13:03 EKP PMT PLAN STARTED WANTS TO DO 40/EOM. WILL CALL IN ON THE 28TH TO DO OVER PH. CONFIRMED AD AND WILL AND EXPLAINED ARRANG LETTER GOING OUT WITH UPDATED BALANCE. ADVISED THAT ONCE SHE IS WORKING FT AGAIN SHE NEEDS TO UP THESE PAYMENTS SINCE IT WILL CURRENTLY TAKE HER A LONG TIME TO PAY OFF.	Y 015 03/25	PAY	
THIS ACTION SENDS A T06 AUTOMATICALLY			
03/11/14 13:03 EKP Ltr to 01 PAYMENT PLAN LETTE SNT	Y 015 03/25 T06	PAY	
03/11/14 13:03 EKP PAYMENT PLAN START UP	Y 015	PAY	
03/11/14 14:33 LAS ADDITIONAL REMARK RECD CK#3005 FOR \$20.00-NOTHING IN IT WINDOW/OK TO APPLY PMT	Y 015	PAY	
03/18/14 21:00 CDS Pymnt Plan Reminder	Y 015 JNK	PAY	
03/26/14 15:32 DMM HOLD VIRTUAL CHECK PAYMENTS DC TO MAKE \$40 CHCK PYMNT FOR MARCH.	N PAY 03/26	HVC	
03/27/14 11:00 MEH PAYMENT RECEIVED	N 015 03/28	PYR	
03/27/14 11:40 MEH ADDITIONAL REMARK	N 015 03/28	PYR	

ALEDFWKC	12/03/18	14:05:29	Print Debtor Work Card		PAGE	3
03/27/14	11:40	MEH Ltr to 01 TIE RECEIPT CHECK	SNT N	015 03/28 RCP	PYR	
04/07/14	09:36	EKP PAYMENT PLAN START UP	N	015	PAY	
05/05/14	11:30	EKP ADDITIONAL REMARK	N	015 07/30	PAY	
06/04/14	19:33	EKP PAYMENT PLAN START UP	N	015	PAY	
06/04/14	19:33	EKP Promise PTP 40.00 On 072514	N	015 07/25	PTP	
07/02/14	14:36	LAS PAYMENT RECEIVED	N	015 07/03	PYR	
07/07/14	08:41	EKP Promise PTP 40.00 On 072514	N	015 07/25	PTP	
07/30/14	21:00	CDS BROKEN PROMISE #ST="PTP" #LW="151033" #RV="000000"	N	015 07/31	BRK	
08/04/14	12:17	LAS PAYMENT RECEIVED	N	015 08/05	PYR	
08/06/14	19:11	EKP Promise PTP 40.00 On 091514	N	015 09/15	PTP	
09/09/14	14:45	LAS PAYMENT RECEIVED	N	015 09/10	PYR	
09/11/14	13:02	EKP Promise PTP 40.00 On 100914	N	015 10/09	PTP	
09/30/14	11:32	LAS PAYMENT RECEIVED	N	015 10/01	PYR	
10/06/14	09:15	EKP Promise PTP 40.00 On 113014	N	015 11/30	PTP	
10/31/14	13:39	LAS PAYMENT RECEIVED	N	015 11/01	PYR	
11/03/14	09:26	EKP Promise PTP 40.00 On 122614	N	015 12/26	PTP	
12/02/14	15:50	LAS PAYMENT RECEIVED	N	015 12/03	PYR	
12/04/14	08:47	EKP Promise PTP 40.00 On 013115	N	015 01/31	PTP	
01/07/15	12:08	ANM PAYMENT RECEIVED	N	015 01/08	PYR	
01/08/15	16:07	EKP Promise PTP 40.00 On 022815	N	015 02/28	PTP	
02/04/15	10:40	ANM PAYMENT RECEIVED	N	015 02/05	PYR	
02/05/15	09:01	EKP Promise PTP 40.00 On 042415	N	015 04/24	PTP	
03/11/15	19:49	EKP ADDITIONAL REMARK	N	015 04/24	PTP	
ADDED TRL FOR SP SINCE HIS INFO IS ON THE BANKING PMT INFO WE RECIEVED. ALSO THE AD ON CHECK IS DIFF FROM HEADER THAT WAS VERIFIED PREV SO JUST ADDED TO SEQ2 FOR SP.						
03/12/15	10:26	LAS PAYMENT RECEIVED	N	015 03/13	PYR	
03/13/15	11:24	EKP Promise PTP 40.00 On 043015	N	015 04/30	PTP	
04/03/15	09:51	LAS PAYMENT RECEIVED	N	015 04/04	PYR	
04/06/15	13:52	EKP Promise PTP 40.00 On 063015	N	015 06/30	PTP	
05/06/15	12:04	BAE PAYMENT RECEIVED	N	015 05/07	PYR	
05/07/15	14:41	EKP ADDITIONAL REMARK PTP ALREADY SET	N	015 06/30	PTP	
06/03/15	10:26	BAE PAYMENT RECEIVED	N	015 06/04	PYR	
06/04/15	09:38	EKP Promise PTP 40.00 On 083015	N	015 08/30	PTP	
07/08/15	10:50	BAE PAYMENT RECEIVED	N	015 07/09	PYR	
07/09/15	08:52	EKP ADDITIONAL REMARK	N	015 08/30	PYR	
08/05/15	15:22	BAE PAYMENT RECEIVED	N	015 08/06	PYR	
08/06/15	14:51	EKP Promise PTP 40.00 On 093015	N	015 09/30	PTP	
09/04/15	16:28	BAE PAYMENT RECEIVED	N	015 09/05	PYR	
09/09/15	11:52	EKP Promise PTP 40.00 On 113015	N	015 11/30	PTP	
09/21/15	11:54	SJP Action Taken NSF FROM TRUST POSTING DEBTOR:0008254571	N	015 09/22	NSF	
09/21/15	11:54	SJP Action Taken NSF FROM TRUST POSTING DEBTOR:0008254572	N	015 09/22	NSF	
09/21/15	11:56	SJP ADDITIONAL REMARK NSF - VCK DATED 9/1/15 FOR \$40 NOT SUFFICIENT FUNDS + \$45 FST/BANK FEE , FEE IS ON TRL # 8254571	N	015 09/22	NSF	
09/22/15	08:31	EKP BROKEN PROMISE	N	015 09/23	BRK	
09/23/15	16:58	EKP DTR LTR REQUESTED	Y	015 10/13	LTR	
09/23/15	16:58	EKP Ltr to 01 FIRST BROKEN PROMI SNT	Y	015 10/13 T08	LTR	
10/07/15	14:46	BAE PAYMENT RECEIVED	Y	015 10/08	PYR	

ALEDFWKC 12/03/18 14:05:29	Print Debtor Work Card	PAGE	4
10/07/15 14:59 BAE ADDITIONAL REMARK	Y 015 10/08	PYR	
RECD ONLN CK# 0000005233 FOR \$40.00, PUT TOWARDS NSF FEE			
10/08/15 08:41 EKP ADDITIONAL REMARK	Y 015 11/30	PTP	
D MADE UP PMT FOR SEPT- STILL HAS NSF FEE TO PAY BUT NEXT PMT NOT DUE TIL NOV			
11/04/15 13:34 BAE PAYMENT RECEIVED	Y 015 11/05	PYR	
11/04/15 19:23 EKP Promise PTP 40.00 On 013016	Y 015 01/30	PTP	
12/04/15 13:17 BAE PAYMENT RECEIVED	Y 015 12/05	PYR	
12/04/15 16:41 EKP ADDITIONAL REMARK	Y 015 01/30	PTP	
D SENT IN ANOTHER PMT			
12/21/15 14:05 EKP ADDITIONAL REMARK	Y 015 01/30	PTP	
SEV NEW TRLS ADDED			
01/06/16 11:57 BAE PAYMENT RECEIVED	Y 015 01/07	PYR	
01/06/16 18:28 EKP Promise PTP 40.00 On 022916	Y 015 02/29	PTP	
01/27/16 14:50 EKP ADDITIONAL REMARK	Y 015 02/29	PTP	
NEW TRL SAME INFO			
02/05/16 09:45 BAE PAYMENT RECEIVED	Y 015 02/06	PYR	
02/08/16 11:26 EKP Promise PTP 40.00 On 032916	Y 015 03/29	PTP	
03/04/16 16:14 BAE PAYMENT RECEIVED	Y 015 03/05	PYR	
03/08/16 09:12 EKP Promise PTP 40.00 On 052916	Y 015 05/29	PTP	
04/12/16 11:14 EKP ADDITIONAL REMARK	Y 015 05/29	PTP	
SEV NEW TRLS ADDED			
05/13/16 09:05 EKP ADDITIONAL REMARK	Y 015 05/29	PTP	
SEV NEW TRLS ADDED- WILL SEND NEW PPL AFTER NEXT PMT COMES IN			
06/03/16 21:00 CDS BROKEN PROMISE	Y 015 06/04	BRK	
#ST="PTP" #LW="151709" #RV="151725"			
06/08/16 11:54 EKP POSSIBLE ASSET FOR LEGAL	Y 015 06/22	PAT	
06/08/16 11:54 EKP Ltr to 01 FIRST BROKEN PROMI SNT	Y 015 06/22 T08	PAT	
06/22/16 13:34 EKP POSSIBLE ASSET FOR LEGAL	Y 015 07/06	PAT	
07/06/16 16:45 EKP POSSIBLE ASSET FOR LEGAL	Y 015 07/20	PAT	
07/06/16 16:45 EKP Ltr to 01 BIESIADA ATTY LETT SNT	Y 015 07/20 027	PAT	
07/13/16 14:36 EKP ADDITIONAL REMARK	Y 015 07/20	PAT	
RECEIVED CALL FROM GALLON AND TACKUS- REP HER ON TRL 8507485			
07/28/16 08:47 EKP POSSIBLE ASSET FOR LEGAL	Y 015 08/11	PAT	
08/01/16 08:25 EKP ADDITIONAL REMARK	Y 015 08/11	PYR	
D MADE PMT TO K			
08/01/16 08:26 EKP PAYMENT PLAN START UP	Y 015	PAY	
08/22/16 07:53 FST Pymnt Plan Reminder	Y 015 JNK	PAY	
09/06/16 07:35 NJQ BROKEN PAYMENT PLAN	Y 015 09/07	BRP	
#ST="PAY" #LW="151789" #RV="151826"			
09/07/16 11:29 EKP POSSIBLE ASSET FOR LEGAL	Y 015 09/21	PAT	
09/23/16 10:37 EKP PAYMENT PLAN START UP	Y 015	PAY	
09/23/16 21:02 CDS Pymnt Plan Reminder	Y 015 JNK	PAY	
10/06/16 21:00 CDS BROKEN PAYMENT PLAN	Y 015 10/07	BRP	
#ST="PAY" #LW="151826" #RV="151856"			
10/07/16 09:21 EKP ADDITIONAL REMARK	Y 015 11/07	BRP	
10/07/16 09:21 EKP Ltr to 01 FIRST BROKEN PROMI SNT	Y 015 11/07 T08	BRP	
11/08/16 16:53 EKP POSSIBLE ASSET FOR LEGAL	Y 015 11/22	PAT	
BACK IN PAT ROTATION- NO PMT MADE			
11/25/16 14:39 EKP POSSIBLE ASSET FOR LEGAL	Y 015 12/25	PAT	
12/28/16 13:34 EKP LEGAL REVIEW	Y 015 01/27	LGR	
12/28/16 13:36 EKP POSSIBLE ASSET FOR LEGAL	Y 015 01/21	PAT	
NO PMTS MADE SINCE JULY. REMOVED PIF TRLS. ADDED IN NEW HSE. WILL SEND			

ALEDFWKC 12/03/18 14:05:29 Print Debtor Work Card PAGE 5  
 LEGAL NEXT MO.

01/26/17 13:54 EKP LEGAL REVIEW	Y	LG1	02/25	LGR
01/26/17 13:54 EKP Ltr to 01 EMPLOYER LETTER - SNT	Y	LG1	02/25 T03	LGR
06/13/17 13:38 HTP Dsk Chg:LG1 To 014	Y	014	06/13	LGR
06/13/17 13:38 HTP Dsk Chg:LG1 To 014	Y	014	06/13	LGR
06/14/17 09:57 HTP Sts Chg:LGR To DLS	Y	014		DLS
06/14/17 09:57 HTP Tie Change	Y	014		DLS
07/18/17 17:07 HTP Sts Chg:DLS To ALS	Y	014		ALS
07/18/17 17:07 HTP Tie Change	Y	014		ALS
07/27/17 11:09 BAE Sts Chg:ALS To PYR	Y	014		PYR
07/27/17 11:09 BAE Tie Change	Y	014		PYR
07/27/17 11:43 BAE Sts Chg:PYR To PIF	Y	014		PIF
07/27/17 15:28 SJP Sts Chg:PIF To REV	Y	014		REV
08/01/17 11:13 AEW Sts Chg:REV To ALS	Y	014		ALS
08/01/17 11:13 AEW ADDITIONAL REMARK	Y	014		ALS
08/02/17 10:01 BAE Sts Chg:ALS To PIF	Y	014		PIF
08/21/17 15:47 SJP CRDT BUR REPORT PIF #PR="1" #TF="Y" #T1=" " #LW="152154"	Y	014		PIF
02/23/18 12:25 SJP CRDT BUR REPORT PIF #PR="R" #TF="Y" #T1="Y" #LW="152174"	Y	014		PIF
03/20/18 20:18 SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152360"	Y	014		PIF
04/24/18 00:10 SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152385"	Y	014		PIF
05/09/18 12:23 DMM Account Untied Untied from Header: [REDACTED] 2260 TRAILER: [REDACTED] 00737 GASTON, ROBIE	Y	014		PIF
05/22/18 14:10 SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152420"	Y	014		PIF
06/21/18 22:34 SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152448"	Y	014		PIF
07/23/18 23:46 SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152478"	Y	014		PIF
08/21/18 15:12 SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152510"	Y	014		PIF
09/19/18 22:52 SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152539"	Y	014		PIF
10/23/18 19:05 SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152568"	Y	014		PIF
11/26/18 23:26 SJP CRDT BUR REPORT PIF #TCC=" " T1="Y" #LW="152602"	Y	014		PIF

**----- TRUST HISTORY -----**

Date	Batch	UID	DSK	TCD	Description	Amount	Comm	NewBlnc
07/27/17	078736	BAE	014	002	PRIN PMT TO CLIENT	69.13	15.90	.00
07/27/17	078736	BAE	014	700	ATTY COMMISSION FEE	3.18	.00	.00
07/27/17	078743	SJP	014	190	REV PRIN PMT TO CLT	69.13-	15.90-	69.13
07/27/17	078743	SJP	014	700	ATTY COMMISSION FEE	3.18-	.00	69.13
08/02/17	999998	BAE	014	001	PRIN PMT TO AGENCY	69.13	15.90	.00

\*\* End of Report \*\*

# Exhibit I

Def. FST Produced Account  
Notes for Toledo Clinic, Inc.  
Reference No. [REDACTED] 730001

ALEDFWKC 12/03/18 13:53:16 Print Debtor Work Card PAGE 4  
 Clt TOLEDO CLINIC INC Ac# FSTI 05998 [REDACTED] 1425  
 Rf# [REDACTED] 30001

Nm1 GASTON, ROBIE	Desk	016	Sts	RVW	Assignnd	768.93
Nm2	Assigned		05/06/16	PrincDue		734.16
Adr 6543 DORR ST APT 43	L/Charge		01/16/14	In .00 %		.00
TOLEDO, OH 43615-4217	L/Paymnt			Attorney		.00
PhN	L/Letter		05/06/16	Court		.00
	L/Worked			Other		.00
	L/Trust		10/24/17	JudInt		.00
Msg	N/Review			Misc		.00
				CntgcyFe		.00
				Tot Due		734.16
				Tot Paid		34.77

## HISTORY

Date	Time	Uid	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
05/06/16	16:18		New Assignment	Y	030	06/05		1	05/06 HSE
05/06/16	21:02		CDS Ltr to 01 FIRST LETTER	Y	030	06/05	001	2	06/06 HSE
05/13/16	09:04	EKP	Dsk Chg:030 To 015	Y	015	06/06		2	06/06 HSE
05/13/16	09:04	EKP	Dsk Chg:030 To 015	Y	015	06/06		2	06/06 HSE
06/08/16	11:54	EKP	Sts Chg:HSE To PAT	Y	015				PAT
06/08/16	11:54	EKP	Tie Change	Y	015				PAT
12/28/16	13:34	EKP	Sts Chg:PAT To LGR	Y	015				LGR
12/28/16	13:34	EKP	Tie Change	Y	015				LGR
12/28/16	13:36	EKP	Sts Chg:LGR To PAT	Y	015				PAT
12/28/16	13:36	EKP	Tie Change	Y	015				PAT
01/26/17	13:55	EKP	Sts Chg:PAT To LGR	Y	015				LGR
01/26/17	13:55	EKP	Dsk Chg:015 To LG1	Y	LG1				LGR
01/26/17	13:55	EKP	Tie Change	Y	LG1				LGR
06/13/17	13:37	HTP	Account Untied	Y	LG1				LGR
UNTIED FROM HEADER: 0008039732 GASTON, RACHEL									
08/31/11	13:59	MJS	CALLED PHN 1-LEFT MSGE ON A/M	Y	017	09/14			DLS
08/31/11	13:59	MJS	DEMAND LETTER SENT	Y	017	09/14			DLS
08/31/11	13:59	MJS	Ltr to 01 DEMAND LETTER TIED SNT	Y	017	09/14	T02		DLS
09/14/11	12:25	MJS	CALLED PHN 1-LEFT MSGE ON A/M	Y	017	10/14			LLS
09/14/11	12:25	MJS	LAST LTR SENT TO DTR	Y	017	10/14			LLS
09/14/11	12:25	MJS	Ltr to 01 LAST LETTER TIED	SNT	Y	017	10/14	T04	LLS
12/01/11	13:33	MJS	ADDITIONAL REMARK	Y	017	12/01			LLS
***LOOKS LIKE THIS D WORKS FOR THE SHERIFFS OFFICE. PER COUNTY EMPLOYEE SIGHT.									
12/01/11	13:34	MJS	ADDITIONAL REMARK	Y	017	12/01			LLS
CORRECTION CENTER.									
12/01/11	13:37	MJS	ADDITIONAL REMARK	Y	017	12/01			LLS
CALLED POE AND WAS TRANFERED TO D. THEY STATED THAT SHE COMES IN AFTER									
4									
12/01/11	13:37	MJS	ACT/PENDING REVIEW	Y	017	12/01			RVW
12/02/11	08:25	MJS	ADDITIONAL REMARK	Y	017	12/02			RVW
12/02/11	16:08	MJS	ACT/PENDING REVIEW	Y	017	12/02			RVW
CALLED POE AND NO ANSW.									
03/28/12	19:46	SBD	CALLED PHN 1-LEFT MSGE ON A/M	Y	006	04/27			LGR
ADDED PHONE FROM TRAILER HAS LEGAL THAT IS NOT YET PAYING									
03/28/12	19:46	SBD	CALLED PHN2 - LFT MSGE ON A/M	Y	006	04/27			LGR
03/28/12	19:46	SBD	LEGAL REVIEW	Y	006	04/27			LGR

ALEDFWKC	12/03/18	13:53:16	Print Debtor Work Card		PAGE	5
03/28/12	19:46	SBD GOOGLED DEBTOR	Y 006	04/27	LGR	
05/30/12	13:48	SBD LEGAL REVIEW	Y 006	06/29	LGR	
05/30/12	13:49	SBD ADDITIONAL REMARK NO NEW INFO	Y 006	06/29	LGR	
07/20/12	10:00	SBD ACT/PENDING REVIEW NOTHING ON LEGAL	Y 006	07/20	RVW	
02/11/13	16:50	KPS CALED PHN 1 - NO ANSWER D ALREADY HAS LEGAL THAT HASN'Y RECEIVED ANYTHING BNUT A \$10 PYMT SO FAR. THESE BILLS HAVE RCV'D FIRST AND LAST LETTERS.	Y 010	02/11	RVW	
02/11/13	16:50	KPS TEL BUSY	Y 010	02/11	RVW	
02/11/13	16:50	KPS ACT/PENDING REVIEW	Y 010	02/11	RVW	
03/14/13	09:04	AEW LEGAL COLLECTOR REVIEW	Y 010	03/15	LRV	
03/29/13	13:40	KPS LEGAL REVIEW NOT SENDING OUT ANY OTHER LTRS ON THIS UNTIL OTHER CURRENT LEGAL STARTS GETTING PAID OFF SOME MORE.	Y 010	04/28	LGR	
06/14/13	09:24	KPS LEGAL REVIEW STILL NO MOVEMENT ON LEGAL CASE. JUST STICKING THIS BACK IN LGR	Y 010	07/14	LGR	
06/14/13	15:29	AEW ADDITIONAL REMARK IF NO UPDATES ON H 5942517 BY AUGUST LET ME KNOW AND I WILL RE-CHK WITH ATTY ON STATUS	Y 010	07/14	LGR	
08/19/13	13:54	DMM TEL MADE CONTACT CD PH#1. SHE STATED WENT TO DOC TODAY & HASN'T BEEN RELEASED TO RETRN TO EMP. SHE GOES BCK TO DOC IN 2-3WKS TO BE RE-ASSESSED. IS ON MED LEAVE. ADVSD I WILL CB 2MOS TO SEE IF SHE'S RETRND TO EMP & SEE ABT P/A	Y 007	10/18	LGR	
08/19/13	13:54	DMM LEGAL REVIEW	Y 007	10/18	LGR	
10/18/13	09:44	DMM LEGAL REVIEW STILL X PYMNTS ON LEGAL	Y 007	11/17	LGR	
02/04/14	11:51	EKP CALLED PHN 1-LEFT MSGE ON A/M SENDING NEW ALS FOR PAT	Y 015	03/06	ALS	
02/04/14	11:51	EKP ATTY LTR SENT TO DTR	Y 015	03/06	ALS	
02/04/14	11:52	EKP ATTY LTR SENT TO DTR	Y 015	03/06	ALS	
02/04/14	11:52	EKP Ltr to 01 BIESIADA ATTY LETT SNT	Y 015	03/06 027	ALS	
02/04/14	11:52	EKP POSSIBLE ASSET FOR LEGAL	Y 015	02/18	PAT	
03/10/14	15:43	CEL COLLECTOR TO COLLECTOR ADDED THREE NEW TRAILERS-cel	Y 015	03/11	CTC	
03/11/14	09:46	EKP POSSIBLE ASSET FOR LEGAL	Y 015	03/25	PAT	
03/11/14	13:03	EKP PMT PLAN STARTED WANTS TO DO 40/EOM. WILL CALL IN ON THE 28TH TO DO OVER PH. CONFIRMED AD AND WILL AND EXPLAINED ARRANG LETTER GOING OUT WITH UPDATED BALANCE. ADVISED THAT ONCE SHE IS WORKING FT AGAIN SHE NEEDS TO UP THESE PAYMENTS SINCE IT WILL CURRENTLY TAKE HER A LONG TIME TO PAY OFF.	Y 015	03/25	PAY	
		THIS ACTION SENDS A T06 AUTOMATICALLY				
03/11/14	13:03	EKP Ltr to 01 PAYMENT PLAN LETTE SNT	Y 015	03/25 T06	PAY	
03/11/14	13:03	EKP PAYMENT PLAN START UP	Y 015		PAY	
03/11/14	14:33	LAS ADDITIONAL REMARK RECD CK#3005 FOR \$20.00-NOTHING IN IT WINDOW/OK TO APPLY PMT	Y 015		PAY	
03/18/14	21:00	CDS Pymnt Plan Reminder	Y 015	JNK	PAY	
03/26/14	15:32	DMM HOLD VIRTUAL CHECK PAYMENTS DC TO MAKE \$40 CHCK PYMNT FOR MARCH.	N PAY	03/26	HVC	
03/27/14	11:00	MEH PAYMENT RECEIVED	N 015	03/28	PYR	
03/27/14	11:40	MEH ADDITIONAL REMARK	N 015	03/28	PYR	

					PAGE	6
ALEDFWKC	12/03/18	13:53:16	Print Debtor Work Card			
03/27/14	11:40	MEH Ltr to 01 TIE RECEIPT CHECK	SNT N	015	03/28	RCP PYR
04/07/14	09:36	EKP PAYMENT PLAN START UP	N	015		PAY
05/05/14	11:30	EKP ADDITIONAL REMARK	N	015	07/30	PAY
06/04/14	19:33	EKP PAYMENT PLAN START UP	N	015		PAY
06/04/14	19:33	EKP Promise PTP 40.00 On 072514	N	015	07/25	PTP
07/02/14	14:36	LAS PAYMENT RECEIVED	N	015	07/03	PYR
07/07/14	08:41	EKP Promise PTP 40.00 On 072514	N	015	07/25	PTP
07/30/14	21:00	CDS BROKEN PROMISE	N	015	07/31	BRK
		#ST="PTP" #LW="151033" #RV="000000"				
08/04/14	12:17	LAS PAYMENT RECEIVED	N	015	08/05	PYR
08/06/14	19:11	EKP Promise PTP 40.00 On 091514	N	015	09/15	PTP
09/09/14	14:45	LAS PAYMENT RECEIVED	N	015	09/10	PYR
09/11/14	13:02	EKP Promise PTP 40.00 On 100914	N	015	10/09	PTP
09/30/14	11:32	LAS PAYMENT RECEIVED	N	015	10/01	PYR
10/06/14	09:15	EKP Promise PTP 40.00 On 113014	N	015	11/30	PTP
10/31/14	13:39	LAS PAYMENT RECEIVED	N	015	11/01	PYR
11/03/14	09:26	EKP Promise PTP 40.00 On 122614	N	015	12/26	PTP
12/02/14	15:50	LAS PAYMENT RECEIVED	N	015	12/03	PYR
12/04/14	08:47	EKP Promise PTP 40.00 On 013115	N	015	01/31	PTP
01/07/15	12:08	ANM PAYMENT RECEIVED	N	015	01/08	PYR
01/08/15	16:07	EKP Promise PTP 40.00 On 022815	N	015	02/28	PTP
02/04/15	10:40	ANM PAYMENT RECEIVED	N	015	02/05	PYR
02/05/15	09:01	EKP Promise PTP 40.00 On 042415	N	015	04/24	PTP
03/11/15	19:49	EKP ADDITIONAL REMARK	N	015	04/24	PTP

ADDED TRL FOR SP SINCE HIS INFO IS ON THE BANKING PMT INFO WE RECIEVED. ALSO THE AD ON CHECK IS DIFF FROM HEADER THAT WAS VERIFIED PREV SO JUST ADDED TO SEQ2 FOR SP.

03/12/15	10:26	LAS PAYMENT RECEIVED	N	015	03/13	PYR
03/13/15	11:24	EKP Promise PTP 40.00 On 043015	N	015	04/30	PTP
04/03/15	09:51	LAS PAYMENT RECEIVED	N	015	04/04	PYR
04/06/15	13:52	EKP Promise PTP 40.00 On 063015	N	015	06/30	PTP
05/06/15	12:04	BAE PAYMENT RECEIVED	N	015	05/07	PYR
05/07/15	14:41	EKP ADDITIONAL REMARK	N	015	06/30	PTP
		PTP ALREADY SET				
06/03/15	10:26	BAE PAYMENT RECEIVED	N	015	06/04	PYR
06/04/15	09:38	EKP Promise PTP 40.00 On 083015	N	015	08/30	PTP
07/08/15	10:50	BAE PAYMENT RECEIVED	N	015	07/09	PYR
07/09/15	08:52	EKP ADDITIONAL REMARK	N	015	08/30	PYR
08/05/15	15:22	BAE PAYMENT RECEIVED	N	015	08/06	PYR
08/06/15	14:51	EKP Promise PTP 40.00 On 093015	N	015	09/30	PTP
09/04/15	16:28	BAE PAYMENT RECEIVED	N	015	09/05	PYR
09/09/15	11:52	EKP Promise PTP 40.00 On 113015	N	015	11/30	PTP
09/21/15	11:54	SJP Action Taken	N	015	09/22	NSF
		NSF FROM TRUST POSTING DEBTOR: [REDACTED] 4571				
09/21/15	11:54	SJP Action Taken	N	015	09/22	NSF
		NSF FROM TRUST POSTING DEBTOR: [REDACTED] 1572				
09/21/15	11:56	SJP ADDITIONAL REMARK	N	015	09/22	NSF
		NSF - VCK DATED 9/1/15 FOR \$40 NOT SUFFICIENT FUNDS + \$45 FST/BANK FEE , FEE IS ON TRL # 8254571				
09/22/15	08:31	EKP BROKEN PROMISE	N	015	09/23	BRK
09/23/15	16:58	EKP DTR LTR REQUESTED	Y	015	10/13	LTR
09/23/15	16:58	EKP Ltr to 01 FIRST BROKEN PROMI SNT	Y	015	10/13 T08	LTR
10/07/15	14:46	BAE PAYMENT RECEIVED	Y	015	10/08	PYR

ALEDFWKC 12/03/18 13:53:16 Print Debtor Work Card PAGE 7  
 10/07/15 14:59 BAE ADDITIONAL REMARK Y 015 10/08 PYR  
     RECD ONLN CK# 0000005233 FOR \$40.00, PUT TOWARDS NSF FEE  
 10/08/15 08:41 EKP ADDITIONAL REMARK Y 015 11/30 PTP  
     D MADE UP PMT FOR SEPT- STILL HAS NSF FEE TO PAY BUT NEXT PMT NOT DUE  
     TIL NOV  
 11/04/15 13:34 BAE PAYMENT RECEIVED Y 015 11/05 PYR  
 11/04/15 19:23 EKP Promise PTP 40.00 On 013016 Y 015 01/30 PTP  
 12/04/15 13:17 BAE PAYMENT RECEIVED Y 015 12/05 PYR  
 12/04/15 16:41 EKP ADDITIONAL REMARK Y 015 01/30 PTP  
     D SENT IN ANOTHER PMT  
 12/21/15 14:05 EKP ADDITIONAL REMARK Y 015 01/30 PTP  
     SEV NEW TRLS ADDED  
 01/06/16 11:57 BAE PAYMENT RECEIVED Y 015 01/07 PYR  
 01/06/16 18:28 EKP Promise PTP 40.00 On 022916 Y 015 02/29 PTP  
 01/27/16 14:50 EKP ADDITIONAL REMARK Y 015 02/29 PTP  
     NEW TRL SAME INFO  
 02/05/16 09:45 BAE PAYMENT RECEIVED Y 015 02/06 PYR  
 02/08/16 11:26 EKP Promise PTP 40.00 On 032916 Y 015 03/29 PTP  
 03/04/16 16:14 BAE PAYMENT RECEIVED Y 015 03/05 PYR  
 03/08/16 09:12 EKP Promise PTP 40.00 On 052916 Y 015 05/29 PTP  
 04/12/16 11:14 EKP ADDITIONAL REMARK Y 015 05/29 PTP  
     SEV NEW TRLS ADDED  
 05/13/16 09:05 EKP ADDITIONAL REMARK Y 015 05/29 PTP  
     SEV NEW TRLS ADDED- WILL SEND NEW PPL AFTER NEXT PMT COMES IN  
 06/03/16 21:00 CDS BROKEN PROMISE Y 015 06/04 BRK  
     #ST="PTP" #LW="151709" #RV="151725"  
 06/08/16 11:54 EKP POSSIBLE ASSET FOR LEGAL Y 015 06/22 PAT  
 06/08/16 11:54 EKP Ltr to 01 FIRST BROKEN PROMI SNT Y 015 06/22 T08 PAT  
 06/22/16 13:34 EKP POSSIBLE ASSET FOR LEGAL Y 015 07/06 PAT  
 07/06/16 16:45 EKP POSSIBLE ASSET FOR LEGAL Y 015 07/20 PAT  
 07/06/16 16:45 EKP Ltr to 01 BIESIADA ATTY LETT SNT Y 015 07/20 027 PAT  
 07/13/16 14:36 EKP ADDITIONAL REMARK Y 015 07/20 PAT  
     RECEIVED CALL FROM GALLON AND TACKUS- REP HER ON TRL 8507485  
 07/28/16 08:47 EKP POSSIBLE ASSET FOR LEGAL Y 015 08/11 PAT  
 08/01/16 08:25 EKP ADDITIONAL REMARK Y 015 08/11 PYR  
     D MADE PMT TO K  
 08/01/16 08:26 EKP PAYMENT PLAN START UP Y 015 PAY  
 08/22/16 07:53 FST Pymnt Plan Reminder Y 015 JNK PAY  
 09/06/16 07:35 NJQ BROKEN PAYMENT PLAN Y 015 09/07 BRP  
     #ST="PAY" #LW="151789" #RV="151826"  
 09/07/16 11:29 EKP POSSIBLE ASSET FOR LEGAL Y 015 09/21 PAT  
 09/23/16 10:37 EKP PAYMENT PLAN START UP Y 015 PAY  
 09/23/16 21:02 CDS Pymnt Plan Reminder Y 015 JNK PAY  
 10/06/16 21:00 CDS BROKEN PAYMENT PLAN Y 015 10/07 BRP  
     #ST="PAY" #LW="151826" #RV="151856"  
 10/07/16 09:21 EKP ADDITIONAL REMARK Y 015 11/07 BRP  
 10/07/16 09:21 EKP Ltr to 01 FIRST BROKEN PROMI SNT Y 015 11/07 T08 BRP  
 11/08/16 16:53 EKP POSSIBLE ASSET FOR LEGAL Y 015 11/22 PAT  
     BACK IN PAT ROTATION- NO PMT MADE  
 11/25/16 14:39 EKP POSSIBLE ASSET FOR LEGAL Y 015 12/25 PAT  
 12/28/16 13:34 EKP LEGAL REVIEW Y 015 01/27 LGR  
 12/28/16 13:36 EKP POSSIBLE ASSET FOR LEGAL Y 015 01/21 PAT  
     NO PMTS MADE SINCE JULY. REMOVED PIF TRLS. ADDED IN NEW HSE. WILL SEND

ALEDFWKC 12/03/18 13:53:16 Print Debtor Work Card PAGE 8  
 LEGAL NEXT MO.

01/26/17 13:54 EKP LEGAL REVIEW	Y	LG1	02/25	LGR
01/26/17 13:54 EKP Ltr to 01 EMPLOYER LETTER - SNT	Y	LG1	02/25 T03	LGR
06/13/17 13:38 HTP Dsk Chg:LG1 To 014	Y	014	06/13	LGR
06/13/17 13:38 HTP Dsk Chg:LG1 To 014	Y	014	06/13	LGR
06/14/17 09:57 HTP Sts Chg:LGR To DLS	Y	014		DLS
06/14/17 09:57 HTP Tie Change	Y	014		DLS
07/18/17 17:07 HTP Sts Chg:DLS To ALS	Y	014		ALS
07/18/17 17:07 HTP Tie Change	Y	014		ALS
10/24/17 11:29 BAE Sts Chg:ALS To PYR	Y	014		PYR
10/24/17 11:29 BAE Action Taken	Y	014		PYR
Applied Desk/Status/Priority/Credit Reporting Flag Changes				
from tied account [REDACTED]2260				
01/12/18 15:31 HTP Sts Chg:PYR To LLS	Y	014		LLS
01/12/18 15:31 HTP Action Taken	Y	014		LLS
Applied Desk/Status/Priority/Credit Reporting Flag Changes				
from tied account 0009002260				
05/09/18 12:23 DMM Sts Chg:LLS To RVW	Y	014		RVW
05/09/18 12:23 DMM Dsk Chg:014 To 007	Y	007		RVW
11/27/18 08:09 AEW Dsk Chg:007 To 016	Y	016		RVW
11/27/18 08:09 AEW Action Taken	Y	016		RVW
Applied Desk/Status/Priority/Credit Reporting Flag Changes				
from tied account [REDACTED]2260				
11/27/18 08:10 AEW Demographics Change	Y	016		RVW
Phnl Chg:4198198381 TO				
Sequence# 01				

----- TRUST HISTORY -----

Date	Batch	UID	DSK	TCD	Description	Amount	Comm	NewBlnc
10/24/17	079518	BAE	014	001	PRIN PMT TO AGENCY	34.77	7.99	734.16

# Exhibit J

Def. FST Produced Account  
Notes for Toledo Clinic, Inc.

Reference No. [REDACTED] 786

1601954

ALEDFWKC 12/03/18 13:53:16  
 Clt THE TOLEDO CLINIC INC  
 Rf# [REDACTED] 5786 1601954

Print Debtor Work Card

PAGE 9  
 Ac# FSTI 059981 [REDACTED] 2831

Nm1 GASTON, ROBIE  
 Nm2  
 Adr 6543 DORR ST APT G43  
 PhN  
 TOLEDO, OH 43615-4217  
 Msg

Desk	016	Sts	RVW	Assignnd	41.14
Assigned		05/10/17	PrincDue		41.14
L/Charge		12/28/16	In	.00 %	.00
L/Paymnt				Attorney	.00
L/Letter		05/10/17	Court		.00
L/Worked				Other	.00
L/Trust		07/27/17	JudInt		.00
N/Review				Misc	.00
				CntgcyFe	.00
			Tot Due		41.14
			Tot Paid		.00

## ----- HISTORY -----

Date	Time	Uid	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
05/10/17	10:09		New Assignment	N	014	06/09	1	05/10	HSE
05/10/17	21:00		CDS Ltr to 01 FIRST LETTER	N	014	06/09	001	2	06/10 HSE
06/10/17	21:00		CDS Ltr to 01 JUNK LETTER	N	014	06/10	JNK	3	06/10 HSE
06/10/17	21:00		CDS Ltr/Ser Completed	N	014	06/10			HSE
06/10/17	21:00		CDS Sts Chg:HSE To NEW	N	014	06/10			NEW
06/10/17	21:00		CDS NEW BUSINESS	N	014	06/11			NEW
06/13/17	13:38		HTP Account Tied	N	014	06/11			NEW
06/14/17	09:57		HTP Sts Chg:NEW To DLS	N	014				DLS
06/14/17	09:57		HTP Tie Change	N	014				DLS
07/18/17	17:07		HTP Sts Chg:DLS To ALS	N	014				ALS
07/18/17	17:07		HTP Tie Change	N	014				ALS
07/27/17	11:09		BAE Sts Chg:ALS To PYR	N	014				PYR
07/27/17	11:09		BAE Tie Change	N	014				PYR
07/27/17	11:43		BAE Sts Chg:PYR To PIF	N	014				PIF
07/27/17	15:28		SJP Sts Chg:PIF To REV	N	014				REV
08/01/17	11:13		AEW Sts Chg:REV To ALS	N	014				ALS
08/01/17	11:13		AEW Tie Change	N	014				ALS
01/12/18	15:31		HTP Sts Chg:ALS To LLS	N	014				LLS
01/12/18	15:31		HTP Action Taken	N	014				LLS

Applied Desk/Status/Priority/Credit Reporting Flag Changes  
 from tied account 0009002260

05/09/18	12:23		DMM Sts Chg:LLS To RVW	N	014				RVW
05/09/18	12:23		DMM Dsk Chg:014 To 007	N	007				RVW
11/27/18	08:09		AEW Dsk Chg:007 To 016	N	016				RVW
11/27/18	08:09		AEW Action Taken	N	016				RVW

Applied Desk/Status/Priority/Credit Reporting Flag Changes  
 from tied account [REDACTED] 2260

11/27/18	08:10		AEW Demographics Change	N	016				RVW
			Phn1 Chg:4198198381 TO						
			Sequence# 01						

## ----- TRUST HISTORY -----

Date	Batch	UId	DSK	TCD	Description	Amount	Comm	NewBlnc
07/27/17	078736	BAE	014	002	PRIN PMT TO CLIENT	41.14	9.46	.00
07/27/17	078736	BAE	014	700	ATTY COMMISSION FEE	1.89	.00	.00
07/27/17	078743	SJP	014	190	REV PRIN PMT TO CLT	41.14-	9.46-	41.14
07/27/17	078743	SJP	014	700	ATTY COMMISSION FEE	1.89-	.00	41.14

ALEDFWKC 12/03/18 13:53:16 Print Debtor Work Card

PAGE 10

# Exhibit L

Def. FST Produced Account  
Notes for Various Accounts

ALEDFWKC 12/03/18 13:53:16 Print Debtor Work Card PAGE 1  
 Clt VARIOUS ACCOUNTS Ac# FSTI ZZZZZZ [REDACTED] 2260

Rf#  
 Nm1 GASTON,ROBIE Desk 016 Sts RVW Assignd 1018.66  
 Nm2 Assigned 04/04/18 PrincDue 983.89  
 Adr DORR ST APT G43 L/Charge In .00 % .00  
 TOLEDO, OH 43615-4217 L/Paymnt Attorney .00  
 PhN L/Letter 01/12/18 Court .00  
 L/Worked 11/27/18 Other .00  
 L/Trust 10/24/17 JudInt .00  
 N/Review 11/27/18 Misc .00  
 Msg CntgcyFe .00  
 Tot Due 983.89  
 Tot Paid 34.77

## ----- HISTORY -----

Date	Time	Uid	Description	CR	Dsk	NxtRv	Txt	NextLtr	Sts
06/13/17	13:38		HTP Account Tied		014	06/14			NEW
06/13/17	13:38		HTP Tie Change Account [REDACTED] 831 Tied		014	06/14			NEW
06/13/17	13:38		HTP Tie Change Account [REDACTED] 1425 Tied		014	06/14			NEW
06/13/17	13:38		HTP Tie Change Account [REDACTED] 0737 Tied		014	06/14			NEW
06/13/17	13:38		HTP Tie Change Account [REDACTED] 9546 Tied		014	06/14			NEW
06/13/17	13:38		HTP Tie Change Account [REDACTED] 8419 Tied		014	06/14			NEW
06/14/17	09:57		HTP Sts Chg:NEW To DLS		014	06/14			DLS
06/14/17	09:57		HTP CALLED PHN 1-LEFT MSGE ON A/M	Y	014	06/28			DLS
06/14/17	09:57		HTP DEMAND LETTER SENT	Y	014	06/28			DLS
06/14/17	09:57		HTP Ltr to 01 DEMAND LETTER TIED SNT	Y	014	06/28	T02		DLS
06/29/17	12:58		HTP ADDITIONAL REMARK CD, HE IS DRIVING, WILL CALL ME BACK TOMORROW MORNING	Y	014	07/15			DLS
07/18/17	17:06		HTP Sts Chg:DLS To ALS	Y	014	07/15			ALS
07/18/17	17:06		HTP CALED PHN 1 - NO ANSWER	Y	014	08/17			ALS
07/18/17	17:06		HTP ATTY LTR SENT TO DTR	Y	014	08/17			ALS
07/18/17	17:06		HTP Ltr to 01 BIESIADA ATTY LETT SNT	Y	014	08/17	027		ALS
07/18/17	17:07		HTP Instr to Trans Exp 08/18/17 B 7-18-17	Y	014	08/17			ALS
07/25/17	15:24		SRD Check/EFT/CC Requested EPPCC: Name: GASTON,ROBIE	Y	014	08/17			ALS
			Acct# [REDACTED] 98972 Exp 06/20						
			PMT 08/01/17 \$ 69.13						
07/25/17	15:24		SRD Check/EFT/CC Requested EPPCC: Name: GASTON,ROBIE	Y	014	08/17			ALS
			Acct# [REDACTED] 98972 Exp 06/20						
			08/25/17 41.14						
07/25/17	15:29		SRD Instr to Trans Exp 08/18/17 B 7-18-17 PLEASE APPLY PAYMENT 69.13 TO -8790737	Y	014	08/17			ALS
			PLEASE APPLY PAYMENT 41.14 TO 8982831						
07/25/17	15:29		SRD Sts Chg:ALS To PYR	Y	014	08/17			PYR
07/25/17	15:29		SRD PAYMENT RECEIVED	Y	014	08/01			PYR

ALEDFWKC 12/03/18 13:53:16 Print Debtor Work Card

PAGE 2

D CALLED IN AND SET UP AUTO FOR THE TWO ACCNTS-

\*8/1/17--\$69.13 -ID#:8790737

\*8/25/17--\$41.14-ID#:8982831

TALKED TO ALLSTART AND THEY ARE GETTING HIM MORE INFO. WANST AT THAT ADDRESS THAT DOS. BUT WILL CALL BACK IN SEPT TO SET UP MORE PAYMENTS.

07/25/17 15:30 SRD Instr to Trans Exp 08/18/17 Y 014 08/01 PYR

B 7-18-17

PLEASE APPLY PAYMENT 69.13 TO 8790737

PLEASE APPLY PAYMENT 41.14 TO 8982831

07/26/17 12:32 NJQ Sts Chg:PYR To HCP Y 014 08/01 HCP

07/26/17 12:32 NJQ Dsk Chg:014 To PAY Y PAY 08/01 HCP

07/26/17 12:32 NJQ ADDITIONAL REMARK N PAY 07/27 HCP

KC(CRISTEN) SD THEY AGRD TO ACCPT 100.00 AS SIF WILL GV INFO TO BKKPNG DIRECTLY SINCE INFO IN "IT" FOR POST DATED PYMNTS

07/27/17 11:08 BAE Sts Chg:HCP To PYR N PAY 07/27 PYR

07/27/17 11:08 BAE Dsk Chg:PAY To 014 N 014 07/27 PYR

07/27/17 11:08 BAE PAYMENT RECEIVED N 014 07/28 PYR

07/28/17 16:11 HTP Sts Chg:PYR To HCC N 014 07/28 HCC

07/28/17 16:11 HTP HOLD CREDIT CARD PAYMENTS N 014 08/01 HCC

08/01/17 16:49 BAE Check/EFT/CC Requested N 014 08/01 HCC

EPPCC: Name GASTON,ROBIE

APPROVED 21261C Approved

PDate: 08/01/17 Amt: Acct# 5146 1601 09298972

08/02/17 13:01 HTP HOLD CREDIT CARD PAYMENTS N 014 08/25 HCC

08/25/17 16:48 BAE Check/EFT/CC Requested N 014 08/25 HCC

EPPCC: Name GASTON,ROBIE

APPROVED 9763CF Approved

PDate: 08/25/17 Amt: Acct# 5146 1601 09298972

08/28/17 15:29 HTP Sts Chg:HCC To CRV N 014 08/25 CRV

08/28/17 15:29 HTP COLLECTOR REVIEW Y 014 09/27 CRV

08/28/17 15:29 HTP Sts Chg:CRV To PTP Y 014 09/27 PTP

08/28/17 15:29 HTP Promise PTP 40.00 On 092817 Y 014 09/28 PTP

08/28/17 15:29 HTP Rescheduled HTP 09/08/17 1529 Y 014 09/28 PTP

Rescheduled HTP 09/08/17 1529

09/08/17 15:30 HTP CALLED PHN 1-LEFT MSGE ON A/M Y 014 09/28 PTP

10/03/17 21:00 CDS Sts Chg:PTP To BRK Y 014 09/28 BRK

10/03/17 21:00 CDS BROKEN PROMISE Y 014 10/04 BRK

#ST="PTP" #LW="152192" #RV="152212"

10/06/17 11:33 HTP CALLED PHN 1-LEFT MSGE ON A/M Y 014 10/06 BRK

10/13/17 14:45 HTP ADDITIONAL REMARK Y 014 10/20 BRK

CD, HE WILL MAIL PMT TOMORRWO, FORGOT

10/20/17 14:42 HTP ADDITIONAL REMARK Y 014 10/20 BRK

CD MAILING TODAY, HAD IN HIS CAR AND FORGOT TO MAIL

10/24/17 11:29 BAE Sts Chg:BRK To PYR Y 014 10/20 PYR

10/24/17 11:29 BAE PAYMENT RECEIVED Y 014 10/25 PYR

10/25/17 11:20 HTP Sts Chg:PYR To PTP Y 014 10/25 PTP

10/25/17 11:20 HTP Promise PTP 40.00 On 112017 Y 014 11/20 PTP

11/25/17 21:00 CDS Sts Chg:PTP To BRK Y 014 11/20 BRK

11/25/17 21:00 CDS BROKEN PROMISE Y 014 11/26 BRK

#ST="PTP" #LW="152239" #RV="152265"

12/01/17 15:26 HTP CALLED PHN 1-LEFT MSGE ON A/M Y 014 12/01 BRK

12/15/17 14:03 HTP CALED PHN 1 - NO ANSWER Y 014 12/15 BRK

12/29/17 09:23 HTP Sts Chg:BRK To PRL Y 014 12/15 PRL

ALEDFWKC	12/03/18	13:53:16	Print Debtor Work Card	PAGE	3		
12/29/17	09:23	HTP CALED PHN 1 - NO ANSWER	Y	014	01/12	PRL	
12/29/17	09:23	HTP PMT REMINDER LTR	Y	014	01/12	PRL	
12/29/17	09:23	HTP Ltr to 01 FIRST BROKEN PROMI SNT	Y	014	01/12 T08	PRL	
01/12/18	15:31	HTP Sts Chg:PRL To LLS	Y	014	01/12	LLS	
01/12/18	15:31	HTP CALED PHN 1 - NO ANSWER	Y	014	02/11	LLS	
01/12/18	15:31	HTP LAST LTR SENT TO DTR	Y	014	02/11	LLS	
01/12/18	15:31	HTP Ltr to 01 LAST LETTER TIED	SNT	Y	014	02/11 T04	LLS
05/09/18	12:23	DMM Account Untied		Y	014	02/11	LLS
		Untied from Header: [REDACTED] 260 TRAILER: [REDACTED] 9546 GASTON, ROBIE					
05/09/18	12:23	DMM Account Untied		Y	014	02/11	LLS
		Untied from Header: [REDACTED] 260 TRAILER: [REDACTED] 419 GASTON, ROBIE					
05/09/18	12:23	DMM Account Untied		Y	014	02/11	LLS
		Untied from Header: [REDACTED] 260 TRAILER: [REDACTED] 737 GASTON, ROBIE					
05/09/18	12:23	DMM Dsk Chg:014 To 007		Y	007	02/11	LLS
05/09/18	12:23	DMM Account Tied		Y	007	02/11	LLS
		Tied to Header: [REDACTED] 260 Trailer: [REDACTED] 510 GASTON, ROBIE					
05/09/18	12:23	DMM Tie Change		Y	007	02/11	LLS
		Account [REDACTED] 510 Tied					
05/09/18	12:27	DMM Sts Chg:LLS To RVW		Y	007	02/11	RVW
05/09/18	12:27	DMM CALED PHN 1 - NO ANSWER		Y	007	05/09	RVW
		CD, MAN ANSWERD "HELLO" AND DIDN'T SAY ANYTHING MORE. HEARD CAR NOISES IN THE BACKGROUND					
05/09/18	12:27	DMM ACT/PENDING REVIEW		Y	007	05/09	RVW
11/27/18	08:09	AEW Dsk Chg:007 To 016		Y	016	05/09	RVW
11/27/18	08:09	AEW ADDITIONAL REMARK		Y	016	11/27	RVW
		DO NOT WORK THIS ACCT/PENDING LEGAL ACTION TAKEN BY D - SEE AEP IF ANY QUESTIONS					
11/27/18	08:10	AEW Account Memo Modified		Y	016	11/27	RVW
		Account Memo change from:					
11/27/18	08:10	AEW Demographics Change		Y	016	11/27	RVW
		Addr1 Chg:6543 DORR ST APT G43 TO DORR ST APT G43					
		Phnl Chg:4198198381 TO					
		Sequence# 01					
11/27/18	08:11	AEW Demographics Change		Y	016	11/27	RVW
		Addr1 Chg: DORR ST APT G43 TO DORR ST APT G43					
		Sequence# 01					

# Exhibit M

January 15, 2018 Letter from  
Financial Systems of Toledo, Inc.



FINANCE SYSTEM OF TOLEDO, INC.  
PO Box 1934  
Southgate, MI 48195-0934

CREDITOR: SEE REVERSE SIDE  
FST ID NUMBER: 0009002260

Roble Gaston  
6543 Dorr St Apt G43  
Toledo, OH 43615-4217

IF PAYING BY MASTERCARD, DISCOVER, VISA OR AMERICAN EXPRESS, FILL OUT BELOW.			
<input checked="" type="checkbox"/> American Express	<input type="checkbox"/> MasterCard	<input type="checkbox"/> Discover	<input type="checkbox"/> VISA
CARD NUMBER	EXP. DATE	AMOUNT	
SIGNATURE	MUST INCLUDE 3 DIGIT SECURITY CODE FROM BACK OF CARD		
AMOUNT DUE \$775.30	SHOW AMOUNT PAID HERE	\$	
DATE: 01/15/18	Phone: (419) 578-4343 * Toll Free: (888) 665-6665 * Fax: (419) 578-4330		

MAKE CHECKS PAYABLE TO:

FINANCE SYSTEM OF TOLEDO, INC.  
PO BOX 351297  
TOLEDO, OH 43635-1297

\*\*\* PLEASE DETACH AND RETURN TOP PORTION WITH YOUR PAYMENT \*\*\*

DATE: 01/15/18

FSTWT04 643019010724 1342/0001179/0003

CREDITOR: SEE REVERSE SIDE  
TOTAL AMOUNT DUE: \$775.30  
FST ID NUMBER: 2260

THIS BILL MAY BE LISTED AGAINST YOUR CREDIT!

IT IS IN YOUR BEST INTEREST TO RESPOND IMMEDIATELY. ANY UNPAID BALANCE SHOWING ON YOUR CREDIT REPORT MAY RESULT IN CREDIT BEING DENIED.

PAY IN FULL IMMEDIATELY TO:

FINANCE SYSTEM OF TOLEDO, INC.

PLEASE DO NOT HESITATE TO CONTACT ME TO RESOLVE THIS IMPORTANT MATTER.

MRS. MEGAN STARR  
419-578-2676

PLEASE SEE REVERSE SIDE FOR ACCOUNT INFORMATION.

MAKE YOUR PAYMENT ONLINE AT [www.FST1952.COM](http://www.FST1952.COM)  
\* USING FST ID NUMBER: 0009002260

THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. ALL RETURNED CHECKS ARE SUBJECT TO A \$30.00 SERVICE CHARGE PLUS BANK FEES.



FINANCE SYSTEM OF TOLEDO, INC.  
2821 N. Holland-Sylvania Rd.  
PO Box 351297  
Toledo, OH 43635-1297  
Phone: (419) 578-4343 \* Toll Free: (888) 665-6665  
Fax: (419) 578-4330

GASTON 000002

Page 1 of 2/T04

<u>Client Name</u>	<u>Client Ref No</u>	<u>Principal</u>	<u>Interest</u>	<u>Other</u>	<u>Total</u>
EPNO INC TOLEDO	400	.00	.00	.00	.00
DATE OF SERVICE	12/25/12	.00	.00	.00	.00
ALLSTAR DISPOSAL					
DATE OF SERVICE	11/11/14	734.16	.00	.00	734.16
TOLEDO CLINIC I	2000000001				
DATE OF SERVICE	01/16/14	.00	.00	.00	.00
TOLEDO CLINIC I	00001				
DATE OF SERVICE	01/14/15	41.14	.00	.00	41.14
TOLEDO CLINIC I	2000000006 16019				
DATE OF SERVICE	12/28/16				
					<hr/>
					775.30